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The state of the control of the cont									a person's name, the search will yield negative results. In order to find a responsive TRI report	under HIPPA and defendants will cannot obtain those records by law	Defendants have previously produced BWC relating to these individuals within Bates Dtamp range No. DEF_000321542 to No. DEF_000321628.	incident		21cv322
The content of the co									of using a specific person's name, EVERY TRI report from that precinct on the date of occurrence	without a HIPPA release from each individual authorizing the release of		that took place on May 29, 2020, at or near the vicinity of the 88th Precinct on Dekalb		First Supplemental Request
Service of the control of the contro									endeavor that would take several hundreds of personel hours potentially leading to negative	,	neither individual was arrested or issued summons. Defendants cannot	Brooklyn, including, but not limited to, Threat, Resistance, or Injury (TRI) reports,		
William of the control of the contro										The production of TRI reports using only a name is unduly burdensome	identify any of the officers in Exhibit A.	summonses, hospital and other medical reports, body-worn camera footage, and any documents		
And 2 State of the contract of									of identifying which video the still photographs came from and thus cannot view the full video			identifying		
With the first control of the contro									in order to determine the identity of the officers. The photographs in Exhibit A are not clear enough to allow defendants to make an identification.	Exhibit A is unduly burdensome.		Officers involved, including but not limited to the following: the police officer in a black or blue		
### A part of the common and in the common and i												uniform and helmet in the screenshot attached as Exhibit A, taken from the body-worn		
Second Continue of the Conti												footage produced by Defendants as Def_CCRB_00019853.		
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Description of the property														,
For Control Plant Standblook, size in the Standblook St									TRI reports cannot be located by NYPD using a person's name. Even when a document contains	"Hospital and other medical reports" are protected from disclosure	Defendants have previously produced BWC relating to this individual		DR No. 2	
Water of the process									of using a specific person's name, EVERY TRI report from that precinct on the date of occurrence	without a HIPPA release from each individual authorizing the release of				
Signature of the control of the cont									would need to be manually reviewed to see if a certain person's name appears in it; an	records in this case specifically.	Notwithstanding objections, no other responsive documents exist as thi individual was not arrested or issued summons	hospital and other medical reports, and any body-worn camera and other video footage from		
The state of the s										The production of TRI reports using only a name is unduly burdensome	A STATE OF THE STA	5:00 PM to		
production of the company of the fig. 13, 123, he was a company of the fig. 13, 123, he was a company of the fig. 13, 123, he was a company of the fig. 13, 123, he was a company of the fig. 13, 123, he was a company of the fig. 13, 123, he was a company of the fig. 13, 123, he was a company of the fig. 13, 123, he was a company of the fig. 123, 123, he was a company of the fig. 123, 123, he was a company of the fig. 123, he was a company of the												12:00 AM, within a two-block radius of the intersection between Tillary and Clinton Streets.		3
In part of Mys. 200, acres to example source from \$2, 120, 00, 100, 100, 100, 100, 100, 100													DR No. 3	
with the first age of the first firs									of using a specific person's name, EVERY TRI report from that precinct on the date of occurrence	without a HIPPA release from each individual authorizing the release of	DEF_000321636	night of May 30, 2020, and into the early morning hours of May 31, 2020, in the vicinity		
The production and water service receives the framework production of the production									would need to be manually reviewed to see if a certain person's name appears in it; an	records in this case specifically.	DEF_000346027	of Dekalb and Flatbush Avenues in Brooklyn, including, but not limited to, identifying		
For expenditure of transport on the control of the										The production of TRI reports using only a name is unduly burdensome	DEF 000346930	hospital and other medical reports, and any body-worn camera and other video		
District Patients (1962) 1979, No Privacy) and Section Medical (1964) 1982 of the Company of th									Without information regarding the source of the pictures in Exhibit B. defendants have no way	The production of documents relating to the identity of the officers in	DEF_000370724 DEF_000370725	footage, from 5:00 PM the night of May 30, 2020, to 3:00 AM the morning of May 31, 2020, including but not limited to the following Officers:		
Carlot Assembly (Carlot Assembly Carlot Assembly Carlot Assembly Assembly Carlot Assembly Assembly Carlot Assembly Assembly Assembly Carlot Ass									of identifying which video the still photographs came from and thus cannot view the full video	Exhibit B is unduly burdensome.		a. Reynaldo Gonzalez (923898 DTS, 84th Precinct);		
A control schedule (Dicel of All Cyr.) The Security of the officer in Calculated (Control of All Cyr.) The Security of the officer in Calculated (Control of All Cyr.) The Security of the Off									enough to allow defendants to make an identification.	s		c. Pavlo Azarov (953647 POM);		
Since of Comparison with the first content this appare in the 19 state of Comparison o														
We will be a second decreased and contents or recipion to be light on the second of the contents of the second of the contents and the second of the conten											including any or are directs in exhaust of	f. Unnamed Officer with the helmet number that appears to be 13990 or a similar		
We you you would make the provided by Agric 15, 2022. When the provided of you first 15, 2022. When the provided of the prov						_				"Mosnital and other medical reports" are protected from disclosure	Defendants have located one BWC video From RO Andrew Samusey the		DR No. 4	4
reports, and body-ware notices from contract feedings that the contract fee										under HIPPA and defendants will cannot obtain those records by law	will be produced by April 15, 2022.	May 29, 2020, near the intersection of Bergen Street and Fifth Avenue in Brooklyn,	DI 140. 4	
A single (Samph Canadatorial (SAMP) 25 May 12 May 12 Market 12 May 12 Ma									IRI reports cannot be located by NYPD using a person's name. Even when a document contains a person's name, the search will yield negative results. In order to find a responsive TRI report	without a HIPPA release from each individual authorizing the release of records in this case specifically.	Notwithstanding objections, no other responsive documents exist as thi	reports, and body-worn camera footage taken by the following Officers:		
Common System (2013) Section (1997) Common Processes (1997) And the common Processes (1997) An									using a specific person's name, EVERY TRI report from that precinct on the date of occurrence	The production of TDI consets using only a name is unduly burdenson many	individual was not arrested or issued summons.	a. Joseph Giannatonio (956675 POM, 78th Precinct);		
OR No. 5 Produce and Sociented setting to flow two State Sensor Zellors May level and Extended State Production of the responsible from Sectionary Production of the State St									endeavor that would take several hundreds of personel hours potentially leading to negative	The production of TKI reports using only a name is unduly outdensoring		c. Eduardo Silva (933356, Lieutenant, 78th Precinct).		
Usus lickrothen, and the protests that bots place on May 29, 2020, at Barchy (cells of the protests state state place) of the certain in this case specifically. In control of the protests state state place of the certain in this case specifically. In control of the protests state state place of the certain in this case specifically. In control of the protests state and post of the certain in this case specifically. In control of the protests state and post of the certain in this case specifically. In control of the protests state and post of the certain in this case specifically. In control of the protests state and post of the certain in the case specifically. In control of the protests state and post of the certain in the case specifically. In control of the protests state and post of the certain in the case specifically. In control of the protests state and post of the certain in the case specifically. In control of the protests state and post of the certain in the case specifically. In control of the protests state and post of the certain in the case specifically. In control of the protests state and post of the certain in the case specifically. In control of the protests state and post of the case of the complete of the control of the certain in the case of the ca						_				"Hospital and other medical reports" are protected from disclosure	Defendants have previously produced BWC relating to these individuals	Produce all documents relating to New York State Senator Zellnor Myrie and	DR No. 5	5
In Strookly, including, but not limited to, documents identifying the Officerily almolic related declarate May 1, summouss, begind and ordinated ordinated o									a person's name, the search will yield negative results. In order to find a responsive TRI report	under HIPPA and defendants will cannot obtain those records by law	at Bates Stamp Nos.:	Assemblymember		
medical reports, and any body-ward cameres footage taken by the following Officers: a. Fir. Colfision (2023) 5371; b. Joseph Tayler (2025) 2571; b. Joseph Tayler (2025) 2571; c. A. Mast Remarked 244300 POssil); c. Donald Weeks (944300) Possil); d. A. Mast Remarked 244300 POssil); d. Camer (2023) 2572 Possil); d. Larry Kern (2023) 2572 Possil); d. Master (2023) 2572 Possil); d. Master (2023) 2572 Possil); d. Larry Kern (2023) 2572 Possil); d. Master (2023) 2572 Possil); d. Master (2023) 2572 Possil); d. Master (2023) 2572 Possil); d. Larry Kern (2023) 2572 Possil); d. Master (2023) 2572 Possil); d. Master (2023) 2572 Possil); d. Master (2023) 2572 Possil); d. Larry Kern (2023) 2572 Possil); d. Master (2023) 2572 P									would need to be manually reviewed to see if a certain person's name appears in it; an	records in this case specifically.	DEF_000321722	in Brooklyn, including, but not limited to, documents identifying the Officer(s) who		
A EVEC (DEAncy (DES)EAS) SET); DES_CO0032177 The production of documents relating to the identity of the different in Exhibit C and this content of documents for the interval of the identity of the different in Exhibit C and the Complaint (Section of May 29, 2020). A ROMAN Veg DES_COSE_CONTENT OF COMPLANT OF COMPLA									endeavor that would take several hundreds of personel hours potentially leading to negative	The production of TRI reports using only a name is unduly hurdensonment				
d. Max Bermuder (94430 POM); e. Denial Vester (94830); f. Erran Vege (94813); f. Erran Vege (94813); f. March Statebesier (95523); f. March Statebesier (955									Without information regarding the source of the pictures in Exhibit C. defendants have no way		DEF_000321727	a. Eric Olfano (921639 SGT);		
d. Max Bermuder (94430 POM); e. Denial Vester (94830); f. Erran Vege (94813); f. Erran Vege (94813); f. March Statebesier (95523); f. March Statebesier (955									of identifying which video the still photographs came from and thus cannot view the full video in order to determine the identity of the officers. The photographs in Exhibit C are not clear	The production of documents relating to the identity of the officers in Exhibit C is unduly burdensome				
E. Ernan Vegs (984533); E. Romon Vegs (9815318); E. Romon Vegs (9815318); E. Romon Vegs (9815318); E. Livery kern (981522 POM); E. Livery kern (981522 POM); E. Livery kern (181523 POM); E. L									enough to allow defendants to make an identification.			d. Max Bermudez (944360 POM);		
Narrior Sectionetic (19552-297-0M); I- Giovanni Calderon; I- Lessin Cartinor, 56(3); I- Terence Monaham; In Marcin Sectionetic (19552-297-0M); I- Lessin Cartinor, 56(3); I- Terence Monaham; In Micro in the whate baint depicted in the image in Exhibit C and the Complaint (5ec.) In Marcin Sectionetic (19552-297-0M); In Marcin Sectioneti										5	which will be produced by April 15, 2022:	e. Donaid Weeks (946389); f. Ernan Vega (948153);		
L Harry Kerr (962522 POM); J. Govanni Calderon; L. Jestica Clitton, SriG2; A. Jestica Clitton, SriG2; A. Romany (2015) B. Rom														
L Evenue Chinton, 50G2; L Terence Monthair; n. Officer in the white shirt depicted in the image in Exhibit C and the Complaint [See par. 20,12]; and n. All other officers depicted in Exhibit C or who were present at Barclay's Center on May 29, 2020. Notivithatanding objections, no other responsive documents exist as neither individual was arrested or saved summon. Defendants identify the officer in the white bark of depicted in Exhibit C as optain lossesh Taylor. Defendants cannot identify any of the other officers in Exhibit C. DR No. 6 Produce all documents identifying the Officers depicted in Exhibit D and the Complaint (See Complaint) (See											d. Max Bermudez (944360 POM);	i. Harry Kerr (962522 POM);		
n. Officer in the white shirt depicted in the image in Exhibit C and the Complaint [See parx. 201]; and n. All other officers stepicted in Exhibit C or who were present at Barclay's Center on May 29, 2020. Notivithstanding objections, no other responsive documents exist as neither individual-was arrested or sixued summon. Defendants identify the officer in the white Barclay Section of documents sent as neither individual-was arrested or issued summon. Defendants identify the officer in the white Barclay Section of documents sent as neither individual-was arrested or issued summon. Defendants identify the officer in the white D is a special to the individual was arrested or issued summon. Defendants identify the officer in the white D is a special to the individual was arrested or issued summon. Defendants identify the officer in the white D is a special to the individual was arrested or issued summon. Defendants identify the officer in the production of documents relating to the identity of the officers in Exhibit D. defendants have no way of identifying which video the still photograph came from and thus cannot view the full video in											g. Ronny Vega (951381);	k. Jessica Clinton, SRG3;		
para. 2013; and n. All other Circles depicted in Exhibit C or who were present at Barclay's Center on Nay 29, 2020. Notwithstanding objections, no other responsive documents exist as neither individual was arrested or issued summons. Defendants identify the control of documents relating to the identify of the officer in hibit D and the Complaint (See DR No. 6 Produce all documents identifying the Officers depicted in Exhibit D and the Complaint (See The production of documents relating to the identity of the officer in hibit D as Sergeant (See The production of documents relating to the identity of the officer in hibit D, defendants have no way of identifying which video the still photograph came from and thus cannot view the full video in The production of documents relating to the identity of the officer in hibit D, defendants have no way of identifying which video the still photograph came from and thus cannot view the full video in														
May 29, 2020. **Notivithstanding objections, no other responsive documents exist as neither individual assurance. Defendants identify the officer in the white short deeple deal is shirted. Cas capation loseph the officer in the white short deeple deal is shirted. Cas capation loseph the officer in the white short deeple deal is shirted. Cas capation loseph the officer is shirted. Cas capation loseph the officer is shirted as a capation of descuments is dentifying the officer with Shede 27's in shirthing to a Seegment. **Defendants is identifying the officer with Shede 27's in shirthing to a Seegment.** **Defendants is identifying the officer with Shede 27's in shirthing to a Seegment.** **Defendants cannot identify the officer with Shede 27's in shirthing to a Seegment.** **Defendants cannot identify the officer with Shede 27's in shirthing to a Seegment.** **Defendants cannot identify the officer with Shede 27's in shirthing to a Seegment.** **Defendants cannot identify the officer with Shede 27's in shirthing to a Seegment.** **Defendants cannot identify the officer with Shede 27's in shirthing to a Seegment.** **Defendants cannot identify the officer with Shede 27's in shirthing to a Seegment.** **Defendants cannot identify the officer with Shede 27's in shirthing to a Seegment.** **Defendants cannot identify the officer with Shede 27's in shirthing to a Seegment.** **Defendants cannot identify the officer with Shede 27's in shirthing to a Shede 27's in sh											y (Johnson Correly)	para. 201); and		
neither individual-was arrested or saved summon. Defendants identify the offerer in the while DE ca optain isospen Taylor. Defendants cannot identify with a profit of the other offerer in Saved summon. Defendants cannot identify with a profit of the other offerer in the while DE cannot identify with a profit of the other offerer in the while C. DR No. 6 Produce all documents identifying the Officers depicted in Exhibit D and the Complaint Csee DR No. 6 Produce all documents identifying the Officers depicted in Exhibit D and the Complaint Csee The production of documents relating to the identity of the officers in Exhibit D. defendants have no way of identifying which video the still photograph came from and thus cannot view the full video in												 n. All other officers depicted in Exhibit C or who were present at Barclay's Center on May 29, 2020. 		
Taylor. Defendants cannot identify any of the other officers in Exhibit C. Dit No. 6 Produce all documents identifying the Officer depicted in Exhibit D and the Complaint Csee (See Defendants Cannot identifying the Officers depicted in Exhibit D and the Complaint Csee (See The production of documents identify to the officer in Inhibit D, defendants have no way of identifying which video to the still photograph came from and thus cannot view the full video in											neither individual was arrested or issued summons. Defendants identify			
(See Thomas Rodriquez. Defendants cannot identify other officers in Exhibit D Exhibit D														
(See Thomas Rodriquez. Defendants cannot identify other officers in Exhibit D Exhibit D						_			Without information regarding the source of the nictures in Exhibit D. defondants have no week	The production of documents relating to the identity of the officers in	Defendants identify the officer with Shield #75 in Exhibit Day Seconds	Produce all documents identifying the Officers denicted in Exhibit Coard the Complaint	DR No. 6	6
nava 160), who ware necess at the Most Hawan protects that took place on lune 4. See the photo is not clear anough to make a positive identification.									of identifying which video the still photograph came from and thus cannot view the full video in	Exhibit D is unduly burdensome	Thomas Rodriquez. Defendants cannot identify other officers in Exhibit	(See	Dr. NO. b	
para. Joby, who were present at the whost reaven process that stock pace on June 4, as the phosto is not clear enough to make a positive identification. 2020, in Mod well-defaults to make the process that stock pace on June 4, as the phosto is not clear enough to all stock pace on June 4, as the June 4, as the phosto is not clear enough to al									order to determine the identity of the officers. The photo graphs in Exhibit D are not clear enough to allow defendants to make an identification.		as the photo is not clear enough to make a positive identification.	para. 169), who were present at the Mott Haven protests that took place on June 4, 2020, in Mott		
Never L.									-					
DR No. 7 Produce all documents relating to Rayne Valentine and the incident that took place on Defendants have previously produced BWC relating to this individual "Hospital and other medical reports" are protected from disclosure TRi reports cannot be located by NYPO using a person's name. Even when a document contains:						_			TRI reports cannot be located by NYPD using a person's name. Even when a document contains	"Hospital and other medical reports" are protected from disclosure	Defendants have previously produced BWC relating to this individual	Produce all documents relating to Rayne Valentine and the incident that took place on	DR No. 7	7
May 30, 2020, at or near the corner of Flatbush and Church Avenues in Brooklyn, within Bates Stamp range No. DEF_000286981, under HIPPA and defendants will cannot obtain those records by law a person's name, the search will yield negative results. In order to find a responsive TRI report									a person's name, the search will yield negative results. In order to find a responsive TRI report	under HIPPA and defendants will cannot obtain those records by law	within Bates Stamp range No. DEF_000286500 to No. DEF_000286981,	May 30, 2020, at or near the corner of Flatbush and Church Avenues in Brooklyn,		
including, but not limited to , Till reports, summonses, hospital and other medical and No. DEF_000320336 (without a HIPPA release from each individual authorizing the release of using a specific person's name pears in it, as any vises footbage, including body-worm center of ottage from Officers (except is made any vises footbage, including body-worm center of ottage from Officers (except is made and person of the manually reviewed to see a feer a feer a feer person's in man expears in it, as no set of the manually reviewed to see a feer a feer a feer person is man expensal in it, as no set of the manually reviewed to see a feer a feer a feer person is manually reviewed to see a feer a feer a feer person is manually reviewed to see a feer a feer a feer person is manually reviewed to see a feer a feer a feer person is manually reviewed to see a feer a feer a feer person is manually reviewed to see a feer a feer a feer person is manually reviewed to see a feer a feer person is manually reviewed to see a feer a feer person is manually reviewed to see a feer a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to see a feet a feet person is manually reviewed to									would need to be manually reviewed to see if a certain person's name appears in it; an			reports, and any video footage, including body-worn camera footage from Officers		
involved in or present at the incident, including, but not limited to Officer Amplid Kasaji. Notwithstanding objections, no other responsive documents exist as this Notwithstanding objections, no other responsive documents exist as this The production of TRI reports using only a name is unduly burdened not responsive documents and in the production of TRI reports using only a name is unduly burdened not responsive documents.										The production of TRI reports using only a name is unduly builded.	Notwithstanding objections no other responsive documents and as the	involved in or present at the incident, including, but not limited to Officer Amjad Kasaji.		
individual was not are table for a Sused summers. In the production or in its points state guiny a name is whoshy unusersalities. I results.									Total Control of the	g or rearrang only a name is allowly buildersolls				
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											T . T . T . T		
^	DR No. 8	C Produce all documents relating to Patricia Delfin and the incident that took place on	D Defendants have previously produced BWC relating to this individual	*Hospital and other medical reports" are protected from disclosure	F TRI reports cannot be located by NYPD using a person's name. Even when a document contains	G H I	J K	L M N O	P	Q R	S T U	V W X Y	∠ AA
	DK NO. 8	May 29, 2020, in the Clinton Hill neighborhood in Brooklyn, including, but not limited to,		under HIPPA and defendants will cannot obtain those records by law without a HIPPA release from each individual authorizing the release of records in this case specifically.	a person's name, the search will yield negative results. In order to find a responsive TRI report using a specific person's name, EVERY TRI report from that precinct on the date of occurrence would need to be manually reviewed to see if a certain person's name appears in it; an endeavor that would take several hundreds of personel hours potentially leading to negative								
3	DR No. 9		related to this individual. Notwithstanding objections, no other	"Hospital and other medical reports" are protected from disclosure under HPPA and defendants will cannot obtain those records by law without a HPPA resease from each individual authorizing the release of records in this case specifically. The production of TRI reports using only a name is unduly burdensome	a person's name, the search will yield negative results. In order to find a responsive TRI report using a specific person's name, EVERYTRI report from that precinct on the date of occurrence would need to be manually reviewed to see if a certain person's name appears in it; an endeavor that would take several hundreds of personel hours potentially leading to negative								
11.	DR No. 10	Produce all documents relating to Dorthley Beauval and the incident that took place on June 1, 2020, in the vicinity of West 56th Street and Broadway in Manhattan, including, but not limited 10, 181 reports, hoopital and other medical records, and any video footage relating to burglary of 1758 Broadway on June 1, 2020, and Beauval's arrest, such as body-worn carrest footage from Officer Daniel Tooma and any other Officer involved in Beauval's arrest.	DEF_000077650, DEF_000227012, and DEF_000163151. Defendants have previously produced BWC relating to this individual at	under HIPPA and defendants will cannot obtain those records by law without a HIPPA release from each individual authorizing the release of									
12	DR No. 11	Produce all documents relating to Dennis Mullikin and the incident that took place on May 31, 2000, new 12th Street and Broadway in Manhattan, including, but not limited to, documents identifying Officers involved in Mullikin's arrest, TRI reports, aided reports, hospital and other	DEF_000153592, and DEF_000226839. Defendants have previously produced BWC relating to this individual	"Hospital and other medical reports" are protected from disclosure under HIPPA and defendants will cannot obtain those records by law without a HIPPA release from each individual authorizing the release of records in this case specifically.									
13	DR No. 12	Produce all documents relating to Hannah Lillevey and the protest that took place on May 28, 2020, at Union Square in Manhatan, including, but not limited to, documents of dentifying Offices involved in the use of force against Lillevey, TRI reports, summonses, hospital and other medical recroits, and any video floatige, including, but not limited its, jour-wine cameral ordinger from Officers at and an a one block radius of Union Square between 3:00 PM and 5:00 PM on May 28, 2020.	within Bates Stamp range No. DEF_000286819 to No. DEF_000321038, and at No. DEF_000321540.	under HIPPA and defendants will cannot obtain those records by law without a HIPPA release from each individual authorizing the release of records in this case specifically.	TRI reports cannot be located by NYPD using a person's name. Even when a document contains a person's name, the search will yield negative results. In order find a response's IPI report from a person's name. EVERY TRI report from that precinct on the date of occurrence would need to be manually reviewed to see if a certain person, name appears in it, an endexwor that would take several hundreds of personel hours potentially leading to negative results.								
14	DR No. 13	Produce all documents relating to Douvya Zayer and the incident that took jake on May 29, 2000, on Racfic Street in Brooklyn, including, but not limited to, TRI reports, 2000, on Racfic Street in Brooklyn, including, but not limited to, hopfy and other medical records, and any video lootage, including, but not limited to, bodywarn camers footage from Officers in the two body and to the product Street and Fallowsh Avenue Selector 730 PM and 590 PM on May 29, 2000.	DEF_000283572. Defendants have previously produced 720 BWC videos relating to this individual in Volume 18-not confidential begining at Bates Stamp No.	Nospital and other medical reports" are protected from disclosure under HIPPA and defendants will cannot obtain those records by law without a HIPPA release from each individual authorizing the release of records in this case specifically.									
35	DR No. 14	Produce all documents relating to Alexandra Crossillat and the incident that tools place on November 4, 2002, at or near living Faces and Est 14th Street—eaver Washington Square Park and Union Square—in-Manhattan, including, but not limited to, documents denething officers areas, TRI reports, summonses, hospital and other medical recrosts, and any video floatege, from 8.00 PM to 11.00 PM, including, but not limited to, body-worn camera areas of the foreign of the first own of the foreign of the f	Defendants will produce summons 444399467. Defendants have previously produce 80W closes relating to this individual within Bates Stamp rage No. DEF_000320348 to No. DEF_000320383 and at No. DEF_000370031.	under HIPPA and defendants will cannot obtain those records by law	TRI reports cannot be located by NYPD using a person's name. Even when a document contains a person's name, the search will yield negative results. In order find a responsive IRI Pit report from that precinct on the date of occurrence would need to be manually reviewed to see if a certain person, name appears in it, an endexwor that would take several hundreds of personel hours potentially leading to negative results.								
36	DR No. 15	b. Hannah Lilleroy (CRBs complain No. 200000532); C. New York State Saxemily Member Dism Richardson and Senator Zellinor Myrie (CCRB complaint No. 200003695); d. Dourney Zayv (CRBs complaint No. 200003692); e. Jacqueine Painter and Carlo Catzadille-Palacio (CCRB complaint No. 202003698); f. Joseph Nolem (CRG complaint No. 200003776); j. Loseph Valentin (CCRB complaint No. 202000478); j. Layon Donnelly (CCRB complaint No. 202000478); j. Jason Donnelly (CCRB complaint No. 202000478); j. Jason Donnelly (CCRB complaint No. 202000366); k Brian Anderson (CCRB complaint No. 202000366);	Cases below have been produced on March 11, 2022 in production VOL035_Confidential. These were also reporteduced on March 16, 2022 due to an error in production: a. Jillian Primanio (CRB complaint No. 202005994); b. Brendan McDermid (CCRB complaint No. 202003901);										

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Î	DR No. 16	Produce the complete and up-to-date CCRB investigation file, including, but not limited	Cases below will be produced on March 18, 2022 in production	-	·	Ü		, , , ,			Q	J , , , ,	" .		
		to, Investigative Action forms, investigator interview summaries or reports, recordings of	a. The May 30 and June 4 protests in East Flatbush involving NYPD												
1 1		Officer interviews, and all other related documents, for the following protests and incidents:	Lieutenant Michael Butler (CCRB complaint Nos. 202003799 and												
		a. The May 30 and June 4 protests in East Flatbush involving NYPD Lieutenant Michael	b. d. The CCRB investigations relating to the May 29 Clinton Hill protest												
		Butler (CCRB complaint Nos. 202003799, 202004204, 202003962); b. The May 30, 2020, incident in Flatbush involving NYPD Captain Vitaliy Zelikov (CCRB	(CCRB complaint No. 202003717)												
		complaint No. 202004408):	Cases below have been produced on March 11, 2022 in production												
		c. The CCRB investigations relating to the June 4 Mott Haven protest (CCRB complaint Nos. 202004055, 202004301, 202004402, 202006855); and	VOL035_Confidential. These were also reporoduced on March 16, 2022 due to an error in production:												
		Nos. 202004055, 202004301, 202004402, 202006855); and d. The CCRB investigations relating to the May 29 Clinton Hill protest (CCRB complaint Nos. 202004179, 202003717).	a. The CCRB investigations relating to the June 4 Mott Haven protest (CCRB complaint Nos. 202004301 and 202004402)												
		NOS. 202004179, 202003717).	b. The CCRB investigations relating to the May 29 Clinton Hill protest												
			(CCRB complaint Nos. 202004179) c. The May 30 and June 4 protests in East Flatbush involving NYPD												
			Lieutenant Michael Butler (CCRB complaint 202003962)												
			d. The May 30, 2020, incident in Flatbush involving NYPD Captain Vitaliy Zelikov (CCRB complaint No. 202004408)												
			e. The CCRB investigations relating to the June 4 Mott Haven protest (CCRB complaint Nos. 202004055)												
			Cases below have been recieved and will be produce prior to the court ordered date:												
			ordered date: a. The CCRB investigations relating to the June 4 Mott Haven protest												
17	DR No. 17	Produce the complete and up-to-date Internal Affairs Bureau (IAB) investigation file,	(CCRB complaint Nos. 202006855) Defendants will search for and produce the requested IAB files to the	Producing all the requested documents is unduly burdensome	The search functionality of the electronic system of the Civil Litigation Unit is limited. CLU can										
		including, but not limited to, investigator interview summaries or reports, recordings of Officer	extent they can be located based upon NYPD's search capabilities.		only search the IAB database using an individual officer's tax ID number. Moreover, it is unclear if date of incident is a searchable category, making it difficult to limit the searches to a particular										
		interviews,	Defendants have already produced:		date of incident. Upon information and belief, the Internal Affairs Bureau is the only entity that										
		and all other related documents, related to or involving the following: a. Huascar Benoît (Identified by IAB No. 20-14374);	New York state Assembly Member Diana Richardson and Senator Zellnor Myrie (Identified by IAB No. 20-13767); produced file beginning		may be able to search by IAB file number and/or complainant's name. Defendants have sent these requests to IAB and IAB is working on locating those files. It is estimated that it would take										
		b. Hannah Lillevoy (Identified by IAB Nos. 20-10199, FI 2020-0479);	at DEF_000285011, and IAB log at DEF_000283838.		at least 250 hours to search for all requested documents, plus an additional 150 hours to										
		 c. New York state Assembly Member Diana Richardson and Senator Zellnor Myrie (Identified by IAB No. 20-13767); 	 Dounya Zayer (Identified by IAB Nos. 20-0410, 20-13708, 20-14206); Produced beginning at DEF_000285043. 		review, redact, and produce them.										
		d. Dounya Zayer (Identified by IAB Nos. 20-0410, 20-13708, 20-14206); e. Jacqueline Painter and Carlos Calzadilla-Palacio (Identified by IAB Nos. 20-0410, 20-	c. Andrew Smith (Identified by IAB No. 20-13824); produced IAB log at												
		13708, and 20-14206);	d. Zuleyka Morales (Identified by IAB Nos. FI-2020-000535, 2020-15371);												
		 f. Joseph Kokesh (Identified by IAB Nos. FI-2020-000478, 2020-14196); g. Andrew Smith (Identified by IAB No. 20-13824); 	Produced at DEF_000283118. d. Jemell Cole; Produced IAB log at DEF_032595												
		h. Rayne Valentine (Identified by IAB No. FI-2020-0430);													
		 i. Carlos Polanco (Identified by IAB Nos. FI-2020-000462; 2020-13963; 2020-22202); j. Dennis Mullikin (Identified by IAB Nos. 2020-000462; 2020-13963); 													
		k. Jason Donnelly (Identified by IAB No. 20-14108); I. Zulevka Morales (Identified by IAB Nos. FI-2020-000535, 2020-15371);													
		m. Lawrence Schober (Identified by IAB Nos. 21-10106 and 2021-09715;													
		n. Melanie Ryan; o. Jemell Cole;													
		p. Jillian Primiano; g. Brendan McDermid (Identified by IAB Nos. FI-2020-000489, 2020-14473);													
		r. Robert Bumsted and Anna Slatz (Identified by IAB Nos. 2020-14809, OG-2020-													
		007172); s. Tyler Berg;													
18	DR No. 18	- - - - - - - - -	Defendants will search for and produce the requested IAB files to the	Producing all the requested documents is unduly burdensome	The search functionality of the electronic system of the Civil Litigation Unit is limited. CLU can										
		including, but not limited to, investigator interview summaries or reports, recordings of Officer	extent they can be located based upon NYPD's search capabilities.		only search the IAB database using an individual officer's tax ID number. Moreover, it is unclear if date of incident is a searchable category, making it difficult to limit the searches to a particular										
		interviews,			date of incident. Upon information and belief, the Internal Affairs Bureau is the only entity that										
		and all other related documents, relating to the following protests and incidents identified in the			may be able to search by IAB file number and/or complainant's name. Defendants have sent these requests to IAB and IAB is working on locating those files. It is estimated that it would take										
		Complaint: a. The May 30, 2020, and June 4, 2020, incidents in the Brooklyn neighborhoods of			at least 250 hours to search for all requested documents, plus an additional 150 hours to review, redact, and produce them.										
		Flathush and Williamshurg respectively involving NYPD Lieutenant Michael Rutler			review, redact, and produce them.										
		including IAB Nos. 2020-17426 (F-2020-2794) and 2020-17377 (FI-2020-661); b. The May 30, 2020 incidents in Flatbush involving NYPD Captain Vitaliy Zelikov,													
		including IAB No. 2020-14991;													
19	DR No. 19	 c. The June 4 Mott Haven protest; and Produce all documents, including any video footage, provided to any District Attorney's 	No responsive documents. None of the individuals mentioned were	Producing all the requested documents is unduly burdensome	Locating and producing "all documents" provided to any of the five district attorneys' offices										
		office investigating any incident at the protests for possible criminal charges, including, but	arrested or issued summons.		for ANY incident at all 83 protest locations, that may or may not involve the several hundreds of summonses and arrests made by 77 commands is unduly burdensome. In addition, relevant										
		not limited			police paperwork, in the form of arrest reports, summonses, TRI and logs, when prepared,										
20		to, Rayne Valentine, Andrew Smith, and Dennis Mullikin.			were already produced as part of separate document requests.										
	DR No. 20	Produce all documents concerning the creation of reports, records, communications,	Reponsive documents wil be produced on March 18, 2022 in												
		assessments, or critiques regarding the NYPD's deployment of officers to protests,	VOL37_Confidential.												
		including, but not limited to, orders, directives, instructions, and communications to create protest													
21		critiques													
11	DR No. 21	Produce all 50-h hearing transcripts for all witnesses identified in the Complaint.	Defendants have produced 50-h hearing trascripts for the following witnesses on March 18, 2022:												
			-Patricia Delfin												
			-Luke Hanna												
11			-Andrew Smith -Zellnor Myrie												
11			-Diana Richardson												
			-Dounya Zayer -Dorthley Beauval												
			-Rob Goyanas												
			There are no records of 50H hearing transcripts for the remaning												
-22	DR No. 22	Produce all documents relating to Rob Goyanes and the incident that took place on	witnesses mentioned in the complaint. Defendants have previously produced BWC videos relating to this	"Hospital and other medical reports" are protected from disclosure	TRI reports cannot be located by NYPD using a person's name. Even when a document contains										
11		June 4, 2020,	individual within Bates Stamp range No. DEF_000321186 to DEF_000321192.	under HIPPA.	a person's name, the search will yield negative results. In order to find a responsive TRI report using a specific person's name, EVERY TRI report from that precinct on the date of occurrence										
11		Place—	_	The production of TRI reports using only a name is unduly burdensom	e. would need to be manually reviewed to see if a certain person's name appears in it; an										
11		including, but not limited to, TRI reports, summonses, hospital and other medical reports, and	Notwithstanding objections, no other responsive documents exist as this individual was not arrested or issued summons.		endeavor that would take several hundreds of personel hours potentially leading to negative results.										
		any body-worn camera and other video footage, from 5:00 PM to 8:00 PM, including													
		from SRG Officer Pecorella (badge number 9542), Officer Romero (badge number 6431), and													
		Officer Blumenthal or Blumenberg (also referred to as "Blumie") (badge number 1231).													
23															
11	DR No. 23	Produce all documents relating to Michael Blau and the incident that took place on June 3, 2020,	VOL37 Confidential. Defendants conducted a search and were unable to	"Hospital and other medical reports" are protected from disclosure under HIPPA.	a person's name, the search will yield negative results. In order to find a responsive TRI report										
		at or near East 54th Street and Third Avenue in Manhattan, including, but not limited	find any BWC related to this individual.		using a specific person's name, EVERY TRI report from that precinct on the date of occurrence										
		to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera		The production of TRI reports using only a name is unduly burdensom	ie. would need to be manually reviewed to see if a certain person's name appears in it; an endeavor that would take several hundreds of personel hours potentially leading to negative										
11		and other video footage, from 8:00 PM to 10:00 PM, and associated with summonses number			results.										
24		4444104948.													

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											STUV		
A	DR No. 24	Produce all documents relating to Aditi Bansal and the incident that took place on June	Defendants will produce responsive documents on March 18. 2022 in	"Hospital and other medical reports" are protected from disclosure	F TRI reports cannot be located by NYPD using a person's name. Even when a document contains	9 H I I J	K.	L M N O	-	ų R	S 1 U V	w a y Z	. AA
11		3, 2020,	VOL37_Confidential. Defendants conducted a search and were unable to		a person's name, the search will yield negative results. In order to find a responsive TRI report								
		at or near East 54th Street and Third Avenue in Manhattan, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn	find any BWC related to this individual.	The production of TRI reports using only a name is unduly burdensome	using a specific person's name, EVERY TRI report from that precinct on the date of occurrence would need to be manually reviewed to see if a certain person's name appears in it; an								
		camera and other			endeavor that would take several hundreds of personel hours potentially leading to negative								
25		video footage, from 8:00 PM to 10:00 PM, and associated with summonses number 4444110203.			resurts.								
	DR No. 25	Produce all documents relating to Holly Gunder and the incident that took place on	Defendants have already produced: DEF_000096420. Defendants	"Hospital and other medical reports" are protected from disclosure									
			conducted a search and were unable to find any BWC related to this individual.	under HIPPA.									
1.1		to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera											
26	DR No. 26		Defendants conducted a search and were unable to find any BWC	"Hospital and other medical reports" are protected from disclosure					_				
		June 3, 2020, at or near East 54th Street and Third Avenue in Manhattan, including, but not	related to this individual.	under HIPPA.									
		2020, at or near East 54th Street and Third Avenue in Manhattan, including, but not limited to,	Notwithstanding objections, no other responsive documents exist as this	The production of TRI reports using only a name is unduly burdensome	TRI reports cannot be located by NYPD using a person's name. Even when a document contains								
		TRI reports, summonses, hospital and other medical reports, and any body-worn camera and	individual was not arrested or issued summons.		a person's name, the search will yield negative results. In order to find a responsive TRI report using a specific person's name, EVERY TRI report from that precinct on the date of occurrence								
		other video footage, from 8:00 PM to 10:00 PM, including from an Officer with badge			using a specific person's name, EVERY TRI report from that precinct on the date of occurrence would need to be manually reviewed to see if a certain person's name appears in it; an								
27		number 4501.			endeavor that would take several hundreds of personel hours potentially leading to negative								
21	DR No. 27		Defendant will produce the following documents will produce the	"Hospital and other medical reports" are protected from disclosure	TRI reports cannot be located by NYPD using a person's name. Even when a document contains								
		Hillary Wright, Jonathan Peck, Marissa Kaiser, Steve Mazzucchi, Vanessa Turi, and Ruvan	following responsive documents on March 18, 2022 in VOL37 Confidential:	under HIPPA.	a person's name, the search will yield negative results. In order to find a responsive TRI report using a specific person's name. EVERY TRI report from that precinct on the date of occurrence								
		Wijesooriya,	Tameer Peak: M21601961 & TRI Number: 2021-001-00006	The production of TRI reports using only a name is unduly burdensome	would need to be manually reviewed to see if a certain person's name appears in it; an								
		and the incident that took place on January 18, 2021, at or near City Hall Park in	Blaise Johnson: 4450084301 & 4450084293 Jonathan Peck: 4442340417 & 4442340465		endeavor that would take several hundreds of personel hours potentially leading to negative								
		including, but not limited to, TRI reports, summonses, arrest reports, hospital and other											
		medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00	Notwithstanding objections, no responsive documents exist for Hillary Wright, Renjamine Heath, Marissa Kaiser, Steve Mazzucchi, Vanessa Turi										
		PM, and	and Ruvan Wijesooriya as none of them were not arrested or issued a										
		associated with summons number M21601961 from arresting officer Morgante, tax ID # 958951.	summonses.										
			Defendants have previously produced BWC videos relating to the following individuals:										
			- Hillary Wright: DEF_000320440 to DEF_000320972, and										
			DEF_000371524 to DEF_000371538 Tameer Peak: DEF_000321220										
			Defendants conducted a search and were unable to find any BWC										
28	DR No. 28	Draduce all decompate relation to Doug Code	related to the remaning individuals.	"Marsital and other medical capacital"					_				
	un NO. 28	June 4, 2020,		"Hospital and other medical reports" are protected from disclosure under HIPPA.									
		at or near Penn Street and Wythe Avenue in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera		The production of TRI reports using each a same is unduly?	TRI reports cannot be located by NYPD using a person's name. Even when a document contains a person's name, the search will yield negative results. In order to find a responsive TRI report								
		and other video		The production of TRI reports using only a name is unduly burdensome	using a specific person's name, EVERY TRI report from that precinct on the date of occurrence								
		footage, from 8:00 PM to 10:00 PM, and associated with summons number 4444106078 issued			would need to be manually reviewed to see if a certain person's name appears in it; an endeavor that would take several hundreds of personel hours potentially leading to negative								
29		by arresting officer Luis Negron, tax ID # 968665.			results.								
	DR No. 29	Produce all documents relating to Kayley Berezney and the incident that took place on June 4,		"Hospital and other medical reports" are protected from disclosure under HIPPA.	TRI reports cannot be located by NYPD using a person's name. Even when a document contains a person's name, the search will yield negative results. In order to find a responsive TRI report								
		2020, at or near Penn Street and Wythe Avenue in Brooklyn, including, but not limited	individual.		using a specific person's name, EVERY TRI report from that precinct on the date of occurrence								
		to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera		The production of TRI reports using only a name is unduly burdensome	 would need to be manually reviewed to see if a certain person's name appears in it; an endeavor that would take several hundreds of personel hours potentially leading to negative 								
		and other			results.								
		video footage, from 8:00 PM to 10:00 PM, and associated with summons number 4444106064											
30		issued by arresting officer Luis Negron, tax ID # 968665.											
	DR No. 30	Produce all documents relating to Marie Kahn and the incident that took place on June 4, 2020.		"Hospital and other medical reports" are protected from disclosure under HIPPA.	TRI reports cannot be located by NYPD using a person's name. Even when a document contains a person's name, the search will yield negative results. In order to find a responsive TRI report								
		at or near Penn Street and Wythe Avenue in Brooklyn, including, but not limited to, TRI	individual.		using a specific person's name, EVERY TRI report from that precinct on the date of occurrence								
		reports, summonses, hospital and other medical reports, and any body-worn camera and other	Notwithstanding objections, no other responsive documents exist as this	The production of TRI reports using only a name is unduly burdensome	 would need to be manually reviewed to see if a certain person's name appears in it; an endeavor that would take several hundreds of personel hours potentially leading to negative 								
		video	individual was not arrested or issued summons. Defendants have not		results.								
		footage, from 8:00 PM to 10:00 PM, and associated with summons number 4444105938 issued	been able to find any record of arrest for this individual on that date and have not been able to find the summons number provided.										
31		by arresting officer Husbands.											
	DR No. 31		Defendants will produce additional responsive documents on March 18, 2022 in VOL37_Confidential.	"Hospital and other medical reports" are protected from disclosure under HIPPA.	TRI reports cannot be located by NYPD using a person's name. Even when a document contains a person's name, the search will yield negative results. In order to find a responsive TRI report								
		2020, at or near Seventh Avenue South and Leroy Street in Manhattan, including, but not limited	Defendants have already produced: DEF 000090842.	The production of TRI reports using only a name is update burdenesses.	using a specific person's name, EVERY TRI report from that precinct on the date of occurrence would need to be manually reviewed to see if a certain person's name appears in it; an								
		to, TRI reports, summonses, hospital and other medical reports, and any body-worn	· -	The production of the reports using only a name is unduly ourgensome	endeavor that would take several hundreds of personel hours potentially leading to negative								
		camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summons number	Defendants conducted a search and were unable to find any BWC related to this individual		results.								
		M20629727 issued by arresting officer Hurchey.											
32	DR No. 32	Produce all documents relating to Dr. Michael Pappas and the incident that took place	Defendants have already produced: DEF_000090620	"Hospital and other medical reports" are protected from disclosure	TRI reports cannot be located by NYPD using a person's name. Even when a document contains		-						
	Dit 140. 32	on June 4.		under HIPPA.	a person's name, the search will yield negative results. In order to find a responsive TRI report								
		2020, in Mott Haven, Bronx, including, but not limited to, documents identifying Officers involved in Pappas's arrest, including the Officers who observed Pappas and	Defendants have previously produced BWC videos relating to the this individual at Bates Stamp Range No. DEF 000321010 to No.	The production of TRI reports using only a name is unduly hurdens one	using a specific person's name, EVERY TRI report from that precinct on the date of occurrence would need to be manually reviewed to see if a certain person's name appears in it; an								
		the arresting officers associated with summons number 4443829723, TRI reports,	DEF_000321021.	3	endeavor that would take several hundreds of personel hours potentially leading to negative								
		hospital and other medical records, and any body-worn camera and other video footage associated with summons number 4443829723, including, but not limited to,			results.								
22		body-worn camera footage from any involved officers.											
33	DR No. 33	Produce all documents relating to Jillian Primiano and the incident that took place on	Defendants have already produced: DEF_000094595.	"Hospital and other medical reports" are protected from disclosure	TRI reports cannot be located by NYPD using a person's name. Even when a document contains				_				
		June 4, 2020, in Mott Haven, Bronx, including, but not limited to, documents identifying		under HIPPA.	a person's name, the search will yield negative results. In order to find a responsive TRI report								
		Officers involved in Primiano's arrest, including the Officers who observed Primiano	Defendants have previously produced BWC videos relating to the this	The production of TRI reports using only a name is unduly burdensome	using a specific person's name, EVERY TRI report from that precinct on the date of occurrence would need to be manually reviewed to see if a certain person's name appears in it; an								
		and the arresting officers associated with summons number 4448281113, TRI reports,	individual at Bates Stamp Range No. DEF_000321010 to No. DEF_000321019, and No. DEF_000321048 to No. DEF_000321053.		endeavor that would take several hundreds of personel hours potentially leading to negative								
		footage associated with summons number 4448281113, including, but not limited to,	DE _000321023, BIO NO. DEF_000321046 to NO. DEF_000321053.		Tudunui.								
34		body-worn camera footage from any involved officers, including but not limited to Brian Destefano.											
	DR No. 34	Produce all documents relating to Marie DeLuca and the incident that took place on	Defendants have already produced: DEF_000090904, DEF_000090906,	"Hospital and other medical reports" are protected from disclosure	TRI reports cannot be located by NYPD using a person's name. Even when a document contains								
		June 4, 2020, in Mott Haven, Bronx, including, but not limited to, documents identifying	and DEF_000094960.	under HIPPA.	a person's name, the search will yield negative results. In order to find a responsive TRI report using a specific person's name, EVERY TRI report from that precinct on the date of occurrence								
		Officers involved in DeLuca's arrest resulting in summons number 4448373565, TRI	Defendants have previously produced BWC videos relating to the this	The production of TRI reports using only a name is unduly burdensome	would need to be manually reviewed to see if a certain person's name appears in it; an								
		video footage associated with summons number 4448373565, including, but not limited	individual at Bates Stamp Range No. DEF_000321010 to DEF_000321019, No. DEF_000321048 to No. DEF_000321052, and at No. DEF_000321177.		endeavor that would take several hundreds of personel hours potentially leading to negative results.								
		to, body-worn camera footage from any involved officers, including but not limited to											
35	DR No. 35	Crystal Washington. Produce all documents relating to Zuleyka Morales and the incident that took place on	Defendants have already produced: DEF 000088142 and	"Hospital and other medical reports" are protected from disclosure	TRI reports cannot be located by NYPD using a person's name. Even when a document contains								-
11		June 2,	DEF_000283200.	under HIPPA.	a person's name, the search will yield negative results. In order to find a responsive TRI report using a specific person's name. EVERY TRI report from that precinct on the date of occurrence								
11		2020, on the West Side Highway in Manhattan (Protest No. 39 in Schedule A), including, but not	Defendants have previously produced BWC videos relating to the this	The production of TRI reports using only a name is unduly burdensome	would need to be manually reviewed to see if a certain person's name appears in it; an								
11			individual at Bates Stamp Range No. DEF_000321643 to DEF_000321654,		endeavor that would take several hundreds of personel hours potentially leading to negative								
		summons number 4441347880, TRI reports, hospital and other medical records, and any body-	and at No. DEF_000286828		results.								
		worn camera and other video footage associated with summons number 444134788,											
		including, but not limited to, body-worn camera footage from the arresting officer, from Patrick Connolly, and from any other Officers involved in the arrest of Morales.											
36			1										

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A	DR No. 36	Produce all documents relating to Keith Boykin and the incident that took place on May	Defendants have already produced: DEF 000075618, DEF 000090674	"Hospital and other medical reports" are protected from disclosure	TRI reports cannot be located by NYPD using a person's name. Even when a document contains	9 H I J	K.	L M N O	-	Ψ	U V	w x Y Z	AA
1 1	DN 140. 30	30,	4443977943, DEF_000282555.	under HIPPA.	a person's name, the search will yield negative results. In order to find a responsive TRI report								
1 1		2020, on the West Side Highway at West 96th Street in Manhattan (Protest No. 9 in Schedule A)			using a specific person's name, EVERY TRI report from that precinct on the date of occurrence								
		including, but not limited to, documents identifying Officers involved in Boykin's arrest		The production of TRI reports using only a name is unduly burdensome	e. would need to be manually reviewed to see if a certain person's name appears in it; an endeavor that would take several hundreds of personel hours potentially leading to negative								
		resulting in summons numbers 4443977943 and 4443977930, TRI reports, hospital and	DEF_000321061.		results.								
		other medical records, and any body-worn camera and other video footage associated with Boykin's arrest, including, but not limited to, body-worn camera footage from the											
		with Boykin's arrest, including, but not limited to, body-worn camera footage from the arresting officer, and from any other Officers involved in the arrest of Boykin.											
37													
	DR No. 37	Produce all documents relating to Jemell Cole and the incident that took place on July 15, 2020.	Defendants have already produced: DEF_000046332.	"Hospital and other medical reports" are protected from disclosure	TRI reports cannot be located by NYPD using a person's name. Even when a document contains								
11		on the Brooklyn Bridge pedestrian path resulting in the arrest of Jemell Cole (voided	Defendants have previously produced BWC videos relating to the this	under HIPPA.	a person's name, the search will yield negative results. In order to find a responsive TRI report using a specific person's name. EVERY TRI report from that precinct on the date of occurrence								
11		arrest No.	individual at Bates Stamp Range No. DEF_000321041 to No.	The production of TRI reports using only a name is unduly burdensome	e. would need to be manually reviewed to see if a certain person's name appears in it; an								
11			DEF_000321047.		endeavor that would take several hundreds of personel hours potentially leading to negative								
11		identifying Officers involved in Cole's arrest, TRI reports, hospital and other medical reports, body-			results.								
11		worn											
20		camera footage, ARGUS footage, and all other video footage associated with Cole's											
38	DR No. 38	Produce all documents concerning any information known to the NYPD before or	Defendants have already produced all responsive documents for June 2,										
11		during the	June 3, and June 4 in the following productions:										
11		following protests concerning illegal conduct, or the possibility thereof, at such location.	VOL007 Confidential										
11		warranting the use of encirclement or kettling tactics:	Range: DEF_000075580 - DEF_000077851										
11		a. June 2, 2020 - Manhattan Bridge;											
11		b. June 3, 2020 – Cadman Plaza; and Midtown Manhattan, near East 54th Street and	VOL008_Confidential Range: DEF_000157572 - DEF_000164804										
11		Avenue;	Kange: DEF_000137372 - DEF_000104004										
11		c. June 4, 2020 – South Williamsburg, near Penn Street and Wythe Avenue;	Defendants are continuing to search for responsive documents relating										
		d. November 4, 2020 – Washington Square Park, in the vicinity of West 8th Street, between	to November 4, and January 18 and will produce any documents prior to the court ordered date.										
		Fifth and Sixth Avenues; and Union Square, near East 14th Street and Fourth Avenue;	July 2001 State of St										
		and											
39	DR No. 39	e. January 18, 2021 – MLK day protest near City Hall Park in Manhattan. Produce all documents relating to Carlos Polanco and the incident that took place on	Defendants conducted a search and were unable to find any DIMC	"Mountal and other medical reports" are protected from disclasses	TRI reports cannot be located by NYPD using a person's name. Even when a document contains				_				
	DK NO. 39	Produce all documents relating to Carlos Polanco and the incident that took place on May 30, 2020 on the F.D.R. Drive in Manhattan including, but not limited to, TRI reports		"Hospital and other medical reports" are protected from disclosure under HIPPA.	a person's name, the search will yield negative results. In order to find a responsive TRI report								
		summonses, hospital and other medical reports, and any body-worn camera and other			using a specific person's name, EVERY TRI report from that precinct on the date of occurrence								
		video footage from the following: a. The Officer in Exhibit E holding the baton in his right hand and spraying OC spray in	Notwithstanding objections, no other responsive documents exist as this individual was not arrested or issued summons	The production of TRI reports using only a name is unduly burdensome	e. would need to be manually reviewed to see if a certain person's name appears in it; an endeavor that would take several hundreds of personel hours potentially leading to negative								
		his left hand;	ma not a react or pasce summons.		results.								
		b. Any other officers identified in Exhibit E;											
40	DR No. 40	c. Sgt. Majer Saleh (Tax ID number 929110). Produce all documents relating to Laisa Pertet and the incident that took place on the	Defendants have previously produced BMC videos relation to the thir	"Hospital and other medical reports" are protected from disclarate	TRI reports cannot be located by NYPD using a person's name. Even when a document contains				-				
11	DK NO. 40	night of	individual within Bates Stamp Range No. DEF_000286975 to No.	under HIPPA.	a person's name, the search will yield negative results. In order to find a responsive TRI report								
11		May 30, 2020, near the Flatbush Extension in Brooklyn including, but not limited to, TRI	DEF 000286981, No. DEF 000320254 to No. DEF 000320298, No.		using a specific person's name, EVERY TRI report from that precinct on the date of occurrence								
11		reports, summonses, hospital and other medical reports, and any body-worn camera and other	DEF_000320315 to No. DEF_000320319, and No. DEF_000321636 to No. DEF_000321642.	The production of TRI reports using only a name is unduly burdensome	e. would need to be manually reviewed to see if a certain person's name appears in it; an endeavor that would take several hundreds of personel hours potentially leading to negative								
11		video footage.	DEF_000321042.		results.								
41			Notwithstanding objections, no other responsive documents exist as this individual was not arrested or issued summons.										
	DR No. 41	Produce all documents relating to Alan Williams and the incident that took place on the	Defendants have already produced: DEF_000088996, DEF_000089016,	"Hospital and other medical reports" are protected from disclosure	TRI reports cannot be located by NYPD using a person's name. Even when a document contains				_				
		evening of May 29, 2020, at or near the Barclay's Center in Brooklyn, near the metal	DEF_000090008, and DEF_000090030.	under HIPPA.	a person's name, the search will yield negative results. In order to find a responsive TRI report using a specific person's name, EVERY TRI report from that precinct on the date of occurrence								
		barricades separating protesters and NYPD officers, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera	Defendants have previously produced 297 BWC videos relation to the		using a specific person's name, EVERY TRI report from that precinct on the date of occurrence would need to be manually reviewed to see if a certain person's name appears in it; an								
11		and other video footage.	this individual within Volume 18-not confidential begining at Bates Stamp		endeavor that would take several hundreds of personel hours potentially leading to negative								
11			No. DEF_000321576, as well as the following Bates Stamp Nos.:		results.								
11			DEF_000283797, DEF_000283821, DEF_000283824, DEF_000283831, DEF_000230091 to No. DEF_000230094.										
42	DD N1 - 42	Produced the second sec	Defendant to the second of the	No. 2d adaptive followed as a second of the									
	DR No. 42	Produce all documents relating to Andrew Smith and the incident that took place in the early		"Hospital and other medical reports" are protected from disclosure under HIPPA.									
		evening of May 30, 2020, at or near the intersection of Bedford and Tilden Avenues in											
		Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical	Defendants have previously produced BWC videos relating to the this individual at the following Bates Stamp Nos.:										
		reports, and	DEF 000284432										
			DEF_000284482										
		Officer Michael Sher.	DEF_000284492 DEF_000320387										
		mensor self.	DEF_000320387 DEF_000320388										
			DEF_000320389										
			DEF_000320390										
43													
	DR No. 43	Produce all documents relating to the use of force against Lawrence Schober that took	Defendants have previously produced BWC videos relating to the this	"Hospital and other medical reports" are protected from disclosure	TRI reports cannot be located by NYPD using a person's name. Even when a document contains								
		place on	individual within Bates Stamp range No. DEF_000230096 to No.	under HIPPA.	a person's name, the search will yield negative results. In order to find a responsive TRI report								
		May 31, 2020, in the vicinity of Broadway and 11th Street in Manhattan, including, but not limited to, documents identifying Officers involved in Schober's arrest, TRI reports,	DEF 000321062 to No. DEF 000321114	The production of TRI reports using only a name is unduly burdensome	using a specific person's name, EVERY TRI report from that precinct on the date of occurrence e. would need to be manually reviewed to see if a certain person's name appears in it; an								
		hospital and other medical reports, ARGUS footage, body-worn camera footage, and all			endeavor that would take several hundreds of personel hours potentially leading to negative								
		other video footage associated with the use of force by Officers against Schober.	Notwithstanding objections, no other responsive documents exist as this individual was not arrested or issued summons.		results.								
***	DR No. 44	Produce all documents relating to the arrest of Brian Anderson (Arrest ID K20619401)		"Hospital and other medical reports" are protected from disclosure									
	1	and the	DEF_000162666, DEF_000162669, and DEF_000104743.	under HIPPA.									
		incident that took place on May 29, 2020, in the vicinity of the 79th Precinct stationhouse, at 263	Defendants have previously produced BWC videos relating to the this										
		Tompkins Avenue in Brooklyn, and Herbert von King Park, (Protest No. 6 in Schedule A)	individual within Bates Stamp range No. DEF 000321599 to No.										
		including, but not limited to, documents identifying Officers involved in Anderson's	DEF_000321601, and No. DEF_000370728 to No. DEF_000370731.										
45	DR No. 45	arrest, TRI reports, hospital and other medical reports, ARGUS footage, body-worn Produce all documents relating to Jason ("Jae") Donnelly and the incident that took	Defendants have proviously produced DWC videos relatives the this	"Margital and other medical reports" are protected from "Orling"	TRI reports cannot be located by NYPD using a person's name. Even when a document contains				_				
1 1	ыК NO. 45	Produce all documents relating to Jason ("Jae") Donnelly and the incident that took place on June 2, 2020, in the vicinity of West 53rd Street and 9th Avenue in Manhattan		"Hospital and other medical reports" are protected from disclosure under HIPPA.	a person's name, the search will yield negative results. In order to find a responsive TRI report								
1 1		The state of the s			using a specific person's name, EVERY TRI report from that precinct on the date of occurrence								
		(Protest No. 36 in Schedule A), including, but not limited to, documents identifying		The production of TRI reports using only a name is unduly burdensome	e. would need to be manually reviewed to see if a certain person's name appears in it; an endeavor that would take several hundreds of personel hours potentially leading to negative								
		Officers involved in the use of force against Donnelley, TRI reports, hospital and other											
		Officers involved in the use of force against Donnelley, TRI reports, hospital and other medical reports, ARGUS footage, body worn camera footage, and all other video	Notwithstanding objections, no other responsive documents exist as this individual was not arrested or issued summons.		results.								
46		Officers involved in the use of force against Donnelley, TRI reports, hospital and other medical reports, ARGUS footage, body worn camera footage, and all other video footage associated with Donnelly, including from Sgt. William Balunas.	individual was not arrested or issued summons.		results.								
45	DR No. 46	Officers involved in the use of force against Donnelley, TRI reports, hospital and other medical reports, ARGUS footage, body worn camera footage, and all other video footage associated with Donnelly, including from Sgt. William Balunas. Produce all documents relating to the arrest of Melanie Ryan (Summons number	individual was not arrested or issued summons. Defendants will produce responsive documents on March 18, 2022 in	"Hospital and other medical reports" are protected from disclosure	results. TRI reports cannot be located by NYPD using a person's name. Even when a document contains								
46	DR No. 46	Offices involved in the use of force against Donnelley, Till reports, hospital and other medical reports, ARGUS footage, body worn camers footage, and all other video footage associated with Donnelly, including from Sgt. William Balunas. Produce all documents relating to the arrest of Melanie Ryan (Summons number 4449869464).	individual was not arrested or issued summons.	"Hospital and other medical reports" are protected from disclosure under HIPPA.	results. TRI reports cannot be located by NYPD using a person's name. Even when a document contains a person's name, the search will yield negative results. In order to find a responsive TRI report								
.65	DR No. 46	Offices involved in the use of force against Donnelley. Till reports, hospital and other medical reports, AGISC footage, aboy from amera footage, and other video footage associated with Donnelly, including from Sgt. William Balunas. Produce all documents relating to the arrest of Melanie Ryan (Summons number 448895464) and the incident that took place on June 3, 2020, in the vicinity of East 50th Street and Third	individual was not arrested or issued summons. Defendants will produce responsive documents on March 18, 2022 in VOL37_Confidential. Defendants have previously produced BVC videos relating to the this	under HIPPA.	results. TRI reports cannot be located by NYFO using a person's name. Even when a document contains a person's name, the search will yield negative results. In order to find a responsive TRI report using a specific person's name, EVERY TRI report from that precinct on the date of occurrence e. would need to be useful acreamably reviewed to see! a certain person's name appears in it, an								
46	DR No. 46	Offices involved in the use of force against Donnelley, Till reports, hospital and other medical reports, ARGUS footage, body worn camers footage, and all other video footage associated with Donnelly, including from Sgt. William Balunas. Produce all documents relating to the arrest of Melanie Ryan (Summons number 4449869464).	individual was not arrested or issued summons. Defendants will produce responsive documents on March 18, 2022 in VOL37_Confidential. Defendants have previously produced BWC videos relating to the this individual within Baset Samo ranee No. DEF 000283043 to No.	under HIPPA.	results. TRI reports cannot be located by NYPD using a person's name. Even when a document contains a person's name, the search will yield negative results. In order to find a responsive TRI report using a specific person's name, EVEN TRI report from that precinct on the date of occurrence								
.6	DR No. 46	Offices involved in the use of force against Donnelley. Till reports, hospital and other medical reports, AGIGS footage, aboy from amera footage, and other video footage associated with Donnelly, including from Sgt. William Balunas. Produce all documents relating to the arrest of Melanie Ryan (Summons number 448989464) and the incident that took place on June 3, 2020, in the vicinity of East 50th Street and Third Avenue in Manhattan, including, but not limited to, documents identifying Officers involved in	individual was not arrested or issued summons. Defendants will produce responsive documents on March 18, 2022 in VOL37_Confidential. Defendants have previously produced BVC videos relating to the this	under HIPPA.	results. TRI reports cannot be located by NYFO using a person's name. Even when a document contains a person's name, the search will yield negative results. In order to find a responsive TRI report using a specific person's name, EVERY TRI report from that precinct on the date of occurrence e. would need to be useful acreamably reviewed to see! a certain person's name appears in it, an								
66	DR No. 46	Offices involved in the use of force against Donnelley, Till reports, hospital and other medical reports, AGISS footages, body own camers lootage, and all other video forstage associated with Donnelly, including from 5gt. William Balunas. Produce all discusses relating to the arrest of Melaine Byan (Summons number 4448989461) and the incident that took place on lune 3, 2020, in the vicinity of East 50th Street and Third Avenue in Manhattan, including, but not limited to, documents identifying Officers involved in the control of the product of the control	individual was not airrested or issued summons. Defendants will produce responsive documents on March 18, 2022 in VOLUZ Confidential. Oberdants have previously produced BVC videos relating to the this individual within Bates Stamp range No. DEF 000283804 to No. DEF 000283804 to Def. 000285814 to Def. 000285804 to Def. 000285805 to D	under HIPPA.	results. TRI reports cannot be located by NYFO using a person's name. Even when a document contains a person's name, the search will yield negative results. In order to find a responsive TRI report using a specific person's name, EVERY TRI report from that precinct on the date of occurrence e. would need to be useful acreamably reviewed to see! a certain person's name appears in it, an								
47	DR No. 46	Offices involved in the use of force against Donnellery, Till reports, hospital and other medical reports, AGAICS footage, aboy own camera footage, and all other video footage associated with Donnelly, including from 5g. William Balunus. Produce all Gournels relating to the arrest of Melanie Byan (Summons number 446989464) and the incident that took place on June 3, 12020, in the vicinity of East 50th Street and Tulmerus in Mehanhatan, including, but not limited to, documents identifying Offices involved in Ryan's arrest, Till reports, hospital and other medical reports, AGICS footage, body-gan's arrest, Till reports, hospital and other medical reports, AGICS footage, body-gan's arrest, Till reports, hospital and other medical reports, AGICS footage, body-gan's arrest, Till reports, hospital and other medical reports, AGICS footage, body-gan's arrest, Till reports, hospital and other medical reports, AGICS footage, body-gan's arrest, Till reports, hospital and other medical reports, AGICS footage, body-	individual was not airrested or issued summons. Defendants will produce responsive documents on March 18, 2022 in VOLUZ Confidential. Oberdants have previously produced BVC videos relating to the this individual within Bates Stamp range No. DEF 000283804 to No. DEF 000283804 to Def. 000285814 to Def. 000285804 to Def. 000285805 to D	under HIPPA.	results. TRI reports cannot be located by NYFO using a person's name. Even when a document contains a person's name, the search will yield negative results. In order to find a responsive TRI report using a specific person's name, EVERY TRI report from that precinct on the date of occurrence e. would need to be useful acreamably reviewed to see! a certain person's name appears in it, an								
47 48	DR No. 46	Offices involved in the use of force against Donnelley, Till reports, hospital and other medical reports, AGISS footages, body own camers lootage, and all other video forstage associated with Donnelly, including from 5gt. William Balunas. Produce all discusses relating to the arrest of Melaine Byan (Summons number 4448989461) and the incident that took place on lune 3, 2020, in the vicinity of East 50th Street and Third Avenue in Manhattan, including, but not limited to, documents identifying Officers involved in the control of the product of the control	individual was not airrested or issued summons. Defendants will produce responsive documents on March 18, 2022 in VOLUZ Confidential. Oberdants have previously produced BVC videos relating to the this individual within Bates Stamp range No. DEF 000283804 to No. DEF 000283804 to Def. 000285814 to Def. 000285804 to Def. 000285805 to D	under HIPPA.	results. TRI reports cannot be located by NYFO using a person's name. Even when a document contains a person's name, the search will yield negative results. In order to find a responsive TRI report using a specific person's name, EVERY TRI report from that precinct on the date of occurrence e. would need to be useful acreamably reviewed to see! a certain person's name appears in it, an								
46 46 48 42 50	DR No. 46	Offices involved in the use of force against Donnelley, Till reports, hospital and other medical reports, AGISS footages, body own camers lootage, and all other video forstage associated with Donnelly, including from 5gt. William Balunas. Produce all discusses relating to the arrest of Melaine Byan (Summons number 4448989461) and the incident that took place on lune 3, 2020, in the vicinity of East 50th Street and Third Avenue in Manhattan, including, but not limited to, documents identifying Officers involved in the control of the product of the control	individual was not airrested or issued summons. Defendants will produce responsive documents on March 18, 2022 in VOLUZ Confidential. Oberdants have previously produced BVC videos relating to the this individual within Bates Stamp range No. DEF 000283804 to No. DEF 000283804 to Def. 000285814 to Def. 000285804 to Def. 000285805 to D	under HIPPA.	results. TRI reports cannot be located by NYFO using a person's name. Even when a document contains a person's name, the search will yield negative results. In order to find a responsive TRI report using a specific person's name, EVERY TRI report from that precinct on the date of occurrence e. would need to be useful acreamably reviewed to see! a certain person's name appears in it, an								

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In Re: New York City Policing During Summer	DR No. 1	Produce body worn camera footage from each of the NYPD members described in	Defendants have already produced DEF 000321247	Body worn camera footage that does not depict the incident involving	1	· ·	н	2 K	L M	N U	r Q R	3	UV	W A Y	Z AA
2020 Demonstrations. 20 Cw. 8924; 20 Cw. 10291; 20 Cw. 10541; 21 Cw. 322; 21 Cw. 533; 21 Cw. 1930 Yates' Second Set Interrogatories and Document SI Requests			through DFE_000321264. Defendants will produce any additional BWC for the incident involving plaintiff within Defense Counsel's possession by the court ordered date.	Yates' requests.											
52	DR No. 2	members identified in Attachment A, regarding the night of May 31, 2020.	Defendants have previously produced responsive documents and will produce any additional responsive documents by the court ordered-date or pursuant to the deposition protocol.		d										
53	DR No. 3	Provide the complete Civilian Complaint Review Board file relating to Cameron Yates' complaint of police misconduct on the night of May 31, 2020.	Defendants have already produced DEF_000321257 to DEF_000321263. Defendants will produce any additional responsive documents for CCRB complaint no. 202005120 on or before the Court-ordered date.												
Yates v NYC, et al 21 Civ 1904 55 First DRIs City, Fausto Pichardo	DR No. 1		Responsive documents previously provided. Any additional responsive documents will be produced prior to the Court-ordered date.												
56.	DR No. 2	complaint about his treatment by police on May 32, 2020 [sic]	Defendants have already produced DEF_000321257 to DEF_000321263. Defendants will produce any additional responsive documents for CCRB complaint no. 202005120 on or before the Court-ordered date.	This request is unintelligible because there is no such date as May 32, 2020.											
21 Cv 1904; 20 Cv 8924 Third Request for Documents 58	DR No. 1		Court-ordered date.	11:59 PM June 1, 2020 that are beyond the scope of this lawsuit, and therefore are not relevant. Any responsive documents will be limited to 12:01 a.m. to 11:59 p.m. on May 31, 2020.	to .										
59	DR No. 2	appears on the documents described in paragraph 1 for the time and dates described in paragraph 1.	Court-ordered date.	This request seeks documents dated from 12:01 AM May 30, 2020 to 11:59 PM June 1, 2020 that are beyond the scope of this lawsuit, and therefore are not relevant. Any responsive documents will be limited to 12:01 a.m. to 11:59 p.m. on May 31, 2020.	to										
60	DR No. 3	appears on the documents described in paragraph 1.	ordered date.	11:59 PM June 1, 2020 that are beyond the scope of this lawsuit, and therefore are not relevant. Any responsive documents will be limited to 12:01 a.m. to 11:59 p.m. on May 31, 2020.	Locating and producing "all photors" of the officers or segreants in Defendants' possession is unduly burdensome. Defendants will produce photographs sufficient to identify police officers to and seggents whose name appears on the roll calls from 12:01 a.m. to 11:59 p.m. on May 31, 2020.										
61	DR No. 4	Provide the 47th Precinct Command Log for the time and dates described in paragraph 1.	Court-ordered date.	This request seeks documents dated from 12:01 AM May 30, 2020 to 11:59 PM June 1, 2020 that are beyond the scope of this lawsuit, and therefore are not relevant. Any responsive documents will be limited to 12:01 a.m. to 11:59 p.m. on May 31, 2020.	10										
Yares v NC, c. al 2 22 c V 304 2 C V	DR No. 1	Provide all documents and video completed by or reliabing to NYPO Sergeant William Mansour, its or Pride #593046, from 12:01 AM May 30, 2020 to \$1:59 PM June 1, 2020. This includes. 2020. This includes. 2. Daily Activity Activity logs; 2. Memo Book Intries; 2. A Frest Report, Supplement Apports, and Online Booking Sheets; 2. A Frest Report, Depart Supplement Booking Sheets; 2. Real Calls from the Blad Precinit. 2. Real Calls from the Blad Precinit. 2. Real Calls from the Blad Precinit of the Sheet	Defendants have already produced DIF_DIP_01700 to DIF_DIP_01726 pt.2726 pursuant to the deposition protocol. Defendants will produce any additional responsive documents on or before the Court-ordered date.	This request seeks documents dated from 12:01 AM May 30, 2000 to 11:59 PMJ une 1, 2000 has are beyond the scope of this lewsy and therefore are not relevant. Any responsive documents will be limited to 12:01 a.m. to 11:59 p.m. on May 31, 2020.	0										
Vates v NYC, et al 21 Cv 1904; 20 Cv 8924 Fifth Request for Documents	DR No. 1	Please provide the Daily Activity Log for May 30, 2020 through June 1, 2022 for the following police officers: A Matthew Varied Tax # 964329) b. Savanus Domenich (Shield #3919) c. Ceclial Wilson (Tax # 954335)	Court-ordered date.	This request seeks documents dated from 12:01 AM May 30, 2020 to 11:59 PM June 1, 2020 that are beyond the scope of this lawsuit, and therefore are not relevant. Any responsive documents will be limited to 12:01 a.m. to 11:59 p.m. on May 31, 2020.	10										
66	DR No. 2	Please provide any body worn camera footage taken by the above referenced officers	Court-ordered date.	This request seeks documents dated from 12:01 AM May 30, 2020 to 11:59 PM June 1, 2020 that are beyond the scope of this lawsuit, and therefore are not relevant. Any responsive documents will be limited to 12:01 a.m. to 11:59 p.m. on May 31, 2020.	to										
	DR No. 3		Defendants have already produced DEF_000321257 to DEF_000321263. Defendants will produce any additional responsive documents for CCRB complaint no. 202005120 on or before the Court-ordered date.												
G. G.	DR No. 4	Please produce all documents produced by or to plaintiff, in the United States Statem botter of New York City Action entitled Albey Pations of all V, yor Mene York et al, Docket 14-CV-2788; include in those documents all deposition transcripts.	Defendants will produce any responsive documents on or before the Court ordered date.	Defendant object to the existe that any responsive documents are sealed by operation of lew and/or pursuant to New York Criminal Procedure Law 59 ±05.00, et see, and an applicable ±05.00 release has not been provided to defendants for the relevant Biggation. Defendant further object to the existent that responsive documents are protected further object to the health insurance Portability and Accountability ACI "FIRA" To r by the law enforcement privilege, deliberative process privilege, and/or any other applicable privilege. Defendants three object to the extent that any responsive documents are subject to a confidentiality order.											
Pagnes MVC, et al. 20 CV 9924 Third Supplemental Set of Document Requests	DR No. 1	for early Officer identified in response to Interregatory No. 18, produce the following: ANPO Taining interrupts; bit Body-wom Camera footage from 6/2/26-6/4/20; bit Body-wom Camera footage from 6/2/26-6/4/20; cl. Activity log from 6/2/26-6/4/20; cl. Activity log from 6/2/26-6/4/20; cl. Activity log from early of protests the Officers attended; Listering logs from early of the Schedule A protests the Officers Body-wom camera toologe from early of the Schedule A protests the Officers Body-wom camera toologe from early of the Schedule A protests the Officers Listering the Company of the Compa	Documents previously produced. Additional non-privileged documents, if any, will be provided to the extent that any privileged documents are withheld.												

Mark																
The control of the co	A B	For every Officer identified in response to Interrogatory No. 19, produce the following	Documents previously produced Additional pop-privileged documents	E	F	G	Н	I J K L	M N	0 P	Q R	S	T U	v w	х	Y Z AA
Part	DN NO. 2	a.NYPD training transcripts;	if any, will be provided. A privilege log will be provided to the extent that													
Series and		b.Body-worn camera footage from 6/4/2020:	any privileged documents are withheld.													
		c. I RI reports related to the Officers from 6/4/20; d Activity logs from 6/4/20:														
Service of the control of the contro		e.List of Schedule A protests the Officers attended;														
Part		f.Activity logs from each of the Schedule A protests the Officers attended;														
Fig. 1		attended:														
The control of the co		h.Arrest/OLBS reports the Officers created during the relevant time period;														
The control of the co		j.DATs the Officers created during the relevant time period;														
Service of the control of the contro		k.AIDED reports related to the Officers during the relevant time period:														
Part		m.Any notes memorialized in the Officers' department-issued cell phones:														
Section Sect		n.Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail														
March Company Compan		o.Complete, up-to-date CCRB and IAB files related to the Officers.														
Selection of the control of the cont	1															
See a serie of the control of the co	DR No. 3	For every Officer identified in response to Interrogatory No. 20, produce the following a NYPD training transcripts:	: Documents previously produced. Additional non-privileged documents, if any will be provided. A privilege log will be provided to the extent that													
AND STATE OF THE PROPERTY OF T		b.Body-worn camera footage from 5/31/20;	any privileged documents are withheld.													
Service of the control of the contro		c.TRI reports related to the Officers from 5/31/20;														
William Control and Authority or any office of the control and		e.List of Schedule A protests the Officer attended;														
Mary Company		f.Activity logs from each of the Schedule A protests the Officer attended; g. Rody-worn camera footage from each of the Schedule A protests the Officer.														
Control of the contro		attended;														
No. 1		h.Arrest/OLBS reports the Officer created during the relevant time period;														
But and comment of the control production and and an experiment of the control production and an experiment of		j.DATs the Officer created during the relevant time period;														
March Column Co		k.AIDED reports related to the Officer during the relevant time period;														
With the control of t		m.Any notes memorialized in the Officers' department-issued cell phones;														
March Control of C																
March Company Compan		o.Complete, up-to-date CCRB and IAB files related to the Officers.														
And the control of th	2		Documents previously produced Additional and privileged d							+ + + -		-				
A Company of the Comp	DR NO. 4	a.NYPD training transcripts;	if any, will be provided. A privilege log will be provided to the extent that													
The control of the co		b.Body-worn camera footage from 6/28/2020;	any privileged documents are withheld.													
Advancement of the first of the		d.Activity log from 6/28/20:														
Advancement of the first of the		e.List of Schedule A protests the Officer attended;														
Modern Control and Anthropidal		g Body-worn camara footage from each of the Schedule A protests the Officer														
Letter on a facility of particular content of the c		attended;														
Might the construction of		i.Summonses the Officer created during the relevant time period:														
The proposal and in the control of t		j.DATs the Officer created during the relevant time period;														
With the control and the contr		LTRI reports related to the Officer during the relevant time period;														
Week of the filter of the control of		m.Any notes memorialized in the Officers' department-issued cell phones;														
Column C		memoranda, and detail rosters; and														
Manufaction dependence of particular for the control of particular	3															
File Mercy 1 A the control of the c	DR No. 5				-											
Sale from manufacturing from (2016-2016-2016) A state of speciment (1940-2016) A state of speciment (1940-		the following:	footage from 6/3/20-6/4/20) by the court ordered date pursuant to the													
In the form of the control of the co		b.Body-worn camera footage from 6/3/20-6/4/20;	deposition protocol.													
Later devices a function state of the control state		c.TRI reports related to the Officers from 6/3/20-6/4/20;														
And the first own and the character of controls of price dependent on the character of the		e List of Schedule A protests the Officers attended:														
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A	DR No. 3	C Provide all Documents concerning CCRB, IAB or other investigations into reported	D Responsive documents previously provided. Additional non-privileged	E		P.	G	-	 J K	L M N	U	Q	R	5 T	, V	w X Y	 AA
		misconduct involving any of the Paintiffs and Defendants arising from the Protests, including but no limited to, compaint nonofication letters, public motification letters, such as a chrowledgement forms, big entires, investigator review reports, recorded audion and/or video footage reviewed, records and/or transcripts of Interviews with members of service and nonmembers of service, memoranda, case closing worksheets, investigator closing reports, recommendations, case analysis, and findings.	Responsive documents previously provided. Additional non-privileged documents, if any the provided a five provided and provided to the extent that any privileged documents are withheld.														
	DR No. 4	Provide all Decoments concerning the Notices of Claim fliefs by Plaintiffs against the City of New York, the NYPO and calter identified and unidentified NYPO officers and personnel artising from the Protests.		Plantiffs are in possesion of thier own Notices of Claim. Notices of Claim for non-parties are not relevant.													
87	DR No. 5	other NYFD Personnel present or involved with the Protests, including but not limited to all log sheets, activity log forms, log books, memo book entries, detail memoranda, post event memoranda or reports, duty rosters, roll calls, assignment sheets, and descriptions of vehicles used by them on the dates of the Protests.			documents for an unknown number of individ	earch for, obtain, and produce "all" the requester duals. Potentially thousands of officers respond to find out if an officer was there is to actually D.	ed										
.88	DR No. 6	Provide all Documents and personnel related records in the possession of the NPPO or the City of New York Concerning Defendants including but not limited to. a. Central Personnel Index file records or similarly defined records; b. Personnel files maintained by NPDO Department of Claywide Administrative Services (TOCAST); c. CCRIB members of service allegation history and investigator closing reports on all investigators of such allegations; such as the control of th	extent that any privileged documents are withheld.														
	DR No. 7	relied on in responding to Plainsiffs' First Set of Interrogatories:	Responsive documents previously provided. Additional non-privileged documents, If any the provided at privilege and will be provided. April provided to the extent that any privileged documents are withheld.														
	DR No. 8	pursuant to Rule 26(a)(1).	Previously provided.														
91	DR No. 9	Provide all Documents sufficient to identify the officers described in the First Amended Complaint at paragraphs 109-203 as NYPD Officers John Doe 1-26, NYPD Officer Jane Doe 1, Officer Doe Esposito, and Sergeant Doe Caraballo.															
92	DR No. 10	All records concerning medical and psychological treatment records for each and any of the Plaintiffs.	Provided to the extent they are in possession of the defendants														
93	DR No. 11	Provide all documents concerning the denials of allegations or affirmative defenses Defendants have asserted or intend to assert in this lawsuit.		This request seeks documents protected from disclosure by attorney client privilege and by the attorney work product privilege abecuse it implicates counsel's selection and compilation of documents. Defendants will not interpose any further response to this request.	t												

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	DR No. 12	Provide all documents not previously requested herein in the possession of Defendants or any of their agents that contain facts or information material to any issue pertaining	See all documents previously produced	Overbroad
		or any or one rigents mut contain racs or mormation materia to any ouse persaming to the Planniffs First Amended Compilain.		
94				
39 Pagnes, WTC, et al. 20 CV 9934 Second Supplemental Set of Document Requests	DR No. 1	For each Officer identified in response to interrogatory Nos. 16 and 17, produce the following: a NYPO training transcripts: a NYPO training transcripts: b Body-worn cames botage from 6/4/20; c Till reports related to the Officer from 6/4/20; d Activity log from 6/4/20; e List of Schedule A protests the Officer attended; f Activity log from each of the Schedule A protests the Officer attended; g Body-worn cames footage from each of the Schedule A protests the Officer attended; h Averacy(VOLBS reports the Officer created during the relevant time period; JOAI's the Officer created during the relevant time period; AUDIC reports related to the Officer during the relevant time period; 1.Till reports related to the Officer during the relevant time period; 1.Till reports related to the Officer during the relevant time period;	deadline. A privilege log will be provided to the extent that any privileged	This request seets documents created by or related to the Officer Valuing the relevant impropriot, 1 from My 22, 2009 issuery 28, 2009 issuery
V. Gray v. NYC, et al. 20 CV 8924, 21 CV 6610 First Request for Production of Documents First Request for Production of Documents on	DR No. 1	All documents concerning all policies, procedures, directives, and training materials relating to Offices' treatment of and response to any member of the press or other relating to Offices' treatment of and response to the recording police activity, including but not limited to profiles recovering; electrifying members of the press; or electrifying members of the press; or electrifying the original portrailists; Offices's treatment of visual portrailists; Offices's treatment of visual portrailists; Offices's treatment of visual portrailists; of the media, members of the press, or anything equivalent thereto; Offices's treatment of individuals who out yiVIO-fluxed press credentials; Offices's treatment of individuals who carry yiVIO-fluxed press credentials; Offices's treatment of individuals who carry yiVIO-fluxed press credentials; Offices treatment of individuals who carry press credentials not issued by NIVIO press desists and/of Corector Andrew Custom between June 1, 2020 and June 2, 2020, including but not infinited to the categories of individuals exempt from such curfers and Offices's treatment of individuals exempt from such curfers.	Responsive documents will be provided prior to the Court-ordered detailine	
	DR No. 2	All documents concerning the installation of any montor, external compliance officer, or independent inspector to review, investigate and/or overset PNPO practices and/or policies relating to any of the subjects identified in Request No. 1.	Responsive documents will be provided prior to the Court-ordered deadline	Amonitor was appointed by the Court in Royal, et al. v. Cly of New Vor, ISC K-V-193.A of the responsive decommants are publishy wallable on the docket sheet. The Office of the Inspector General for the NYPD (IGG-NYPD), is independent agency change with investigating "NYPD practices and/or policies" pursuant to Local Law 70. Additional information about this independent inspects for inspective in publishy available at https://www.lnyc.gov/ste/doi/offices/lognyyd.page. Further, the "Identification" as well as "the terms governing the appointment, responsibilities, and authority" of any "monitor, reternal compliance officers, or independent inspects being appointed to review, investigate and/or oversets with or prolicies. And office or policies, and office or independent inspects being appointed to review, investigate and/or oversets of the reviewors of this sequent to three linguistions, in not proportional, in addition, the bourden of identifying each such "monitor, external degreeated in the overset of the religions of reprotocologies of the reviewors of this expects to three linguistions, in not proportional, in addition, the bourden of identifying each such "monitor, external ordinalized reference of the response of this expects of them (inspects) with "monitor, external ordinalized reference of the response of this expects of them (inspects) with "monitor, external ordinalized reference of the response of this expects of them (inspects) with "monitor, external ordinalized reference or the size of the overset of the response of this expects of them."
99	DR No. 3	All documents concerning any drafting, revision, critique, evaluation, or review of any policies, procedures, directives, or training materials described in Request No. 1.	Responsive documents will be provided prior to the Court-ordered deadline	
101	DR No. 4	persons who attended, any statistical reports of the ranks of members of the service that attended, and any certifications issued to such attendees, as well as any evaluations of such training materials, presentations, or other similar materials completed by such attendees.	deadline	
102	DR No. 5	All documents concerning Officers receiving discipline for misconduct relating to their violation of any policies, procedures, directives, or training materials described in	Responsive documents will be provided prior to the Court-ordered deadline	
	DR No. 6		(Affilia) February incidentil, DEF 2000322185 - DEF 200032286 / DEF 200032280 / DEF 200032280 / DEF 200032280 / DEF 200032280 / DEF 20003280	OEF_0035480-0EF_0035499, OEF_00034760, DEF_00034799, OEF_00034760, DEF_00034760-1 OEF_0034760, DEF_00034760-1 OEF_0034760, DEF_0034760-1 OEF_0034760, DEF_0034760, DEF_0034760, OEF_0034760, DEF_0034760, DEF_0034760, OEF_0034760, DEF_0034760, DEF_0034760, OEF_0034760, DEF_00347760
103			Amr Alfiky's IAB file:DEF_0325926 - DEF_0325934, DEF_0325944 - DEF_0325955	
104	DR No. 7 DR No. 8	All documents concerning the arrest of any member of the press engaged in newsgathering. All documents concerning the use of force by an Officer against any member of the	Responsive documents will be provided prior to the Court-ordered deadline Responsive documents will be provided prior to the Court-ordered	
05	DR No. 9	press engaged in newsgathering.	Responsive documents will be provided prior to the Court-ordered deadline Responsive documents will be provided prior to the Court-ordered	
06	UN INU. 5	credential or other press credential from any member of the press.	Responsive documents will be provided prior to the Court-ordered deadline	

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F-F)		
A	DR No. 10	C All documents concerning Officers receiving discipline for misconduct relating to the	D Responsive documents will be provided prior to the Court-ordered	E F G H I J	K	L M N O F	- 9	RSTU	v W X Y Z	AA
1 1		arrest of or use of force against a member of the press, or who have been	deadline							
11		recommended to receive discipline for such misconduct, including but not limited to documents issued by the NYPD, CCRB, Office of the Inspector General, CCPC, or any								
107	DR No. 11	All documents concerning the arrest of any person engaged in photographing or video	Responsive documents will be provided prior to the Court-ordered							
109	DIT 140: 22	recording any Officer.	deadline							
	DR No. 12	All documents concerning the use of force by an Officer against any person engaged in	Responsive documents will be provided prior to the Court-ordered							
		photographing or video recording any Officer.	deadline							
109										
	DR No. 13	All documents concerning Officers receiving discipline for misconduct relating to the arrest of or use of force against any person engaged in photographing or video	Responsive documents will be provided prior to the Court-ordered deadline							
		recording any	uccom c							
		Officer, or who have been recommended to receive discipline for such misconduct, including but								
		not limited to documents issued by the NYPD, CCRB, Office of the Inspector General,								
110	DR No. 14	CCPC, or any other agency or entity of the City of New York.								
	DK NO. 14	To the extent not encompassed by the above, all documents concerning any person or incident described in Paragraphs 98-101 of the Complaint, including but not limited to	deadline							
		documents reflecting the NYPD's investigation of and response to these incidents and any policy changes implemented as a result thereof.								
111										
	DR No. 15		Responsive documents will be provided prior to the Court-ordered							
112		receiving discipline for misconduct relating to events involving any person named in Paragraphs 98-101 of the Complaint, or who have been considered for receipt of	deadline							
	DR No. 16	All NYPD directives, departmental messages, or other general communications with	Responsive documents can be found at the following Bates Nos.: DEF-							
		Officers relating to the curfew orders issued by Mayor Bill de Blasio and/or Governor Andrew Cuomo between June 1, 2020 and June 8, 2020, including exemptions thereto.	DEF-E 000039926, DEF-E 000039926, DEF-E 000032642, DEF-E 000046136,							
			E_000039932-33, DEF-E_000039950-51, DEF-E_000046043-45, DEF-							
11			E_000032464-70, DEF-E_000032643-44, DEF-E_000046136, DEF- E_000038565-66, DEF-E_000053152-53, DEF-E_000053930-32, DEF-							
1 1			E_000055042, DEF-E_000039928-29, DEF-E_000029314, DEF-							
113	DR No. 17	All neconnel related records in the necession of the NVOD or the City of New York for	E 000006632, DEF-E 000032402	Records prior to 2012 are not in electronic format, therefore difficult to	-		-			
11	DA 190. 1/	All personnel-related records in the possession of the NYPD or the City of New York for each Officer identified as a Defendant in the Photographers' Lawsuit, including but not	Training records for the named defendants have been provided:	search files are not in electronic format and paper copies are in storage						
11		limited to: a.Records reflecting the Officer's histories as to CCRB and IAB investigations, as well as	DEF 0325799 - DEF 0325921 CPI/IAR/CCRR Histories are	in one of three place. Depending on if they been indeed clearly and proposely they may be difficult to locate. From 2012 through 2018.						
1 1		underlying records;	sering derived over 46 mounts prior to the scheduled deposition.	"outside guidelines" files are paper only, some are in storage, and the						
11		 The Academy Transcript and all training logs and other records reflecting the NYPD training each Officer received at the NYPD Academy and after graduating the 		same sisses as above apply. Logs however, and not the entire files, are available in electron format, but contain limited informatal in:						
		NYPD Academy; c. Central Personnel Index ("CPI") file records or similarly defined records;		estimated that it would take at least 250 hours to search for all						
		c. Central Personnel Index ("CPI") file records or similarly defined records;		requested documents, plus an additional 150 hours to review, reduct, and produce them.						
		 d. Any and all records concerning internal NYPD disciplinary action, letters in the personnel file, command discipline, charges and specifications, transfers, and/or 		and produce trem.						
		warnings and admonishments; e. Performance profiles, or similarly defined records;								
		Performance profiles, or similarly defined records; Psychological Services Unit ("PSU") records or similarly defined records;								
		g. Risk Assessment Information Liability System ("RAILS") records;								
		h. Early warning or intervention records or similarly defined records; i. Supervisor complaint reports or command discipline election reports:								
		j. Any and all letters requesting sealing of disciplinary records or charges;								
		k. Any and all documents related to performance monitoring; l. Giglio profiles and/or similar resume providing information regarding all internal								
		NYPD and CCRB complaints, investigations, and dispositions, including the Police								
		Commissioner's case analysis; m. Records from the Internal Affairs Bureau, Inspectional Services Division, Office of the								
		Chief of the Department, or Department Advocates Office;								
		n. The caption, complaint, and records reflecting the disposition of any and all lawsuits against each such Officer:								
L.,		 To the extent not covered in the preceding sub-paragraphs, all documents relating to 								
114	DR No. 18	The Academy Transcript and all training logs and other records reflecting the NYPD training each named Defendant received at the NYPD Academy and after graduating the								
		training each named Defendant received at the NYPD Academy and after graduating the NYPD Academy.	DEF_0325799 - DEF_0325921							
		THE PRODUCTY.								
115	DR No. 19	A full copy of the current NYPD Patrol Guide disseminated to Officers, plus copies of	The arread upon sections: PG 212-49 PG 208-2 PG 203-29							
	Dit 140. 25	each and every version of the NYPD Patrol Guide disseminated to Officers between	Administrative Guide Procedure 304-21, will be provided prior to the							
		1999 and the present, with sufficient information to identify the changes and additions between each version.	Cort-ordered deadline.							
	DR No. 20	All documents identified or relied upon in responding to any Interrogatories Plaintiffs	No interrogatories have been served in this case.							
117	DR No. 21	serve in the Photographers' Lawsuit. Documents sufficient to identify any instance of a monitor, external compliance officer,		A monitor was appointed by the Court in Floyd, et al. v. City of New	_		_			
1 1	Dit 190. 21	or independent inspector being appointed to review, investigate and/or oversee NYPD	occurrence with rot be provided:	York, 08-CV-1034, and the responsive documents are publicly available						
		practices and/or policies by virtue of a court order or other resolution of a legal		on the docket sheet. The Office of the Inspector General for the NYPD						
		proceeding, as well as the terms governing the appointment, responsibilities, and authority of any such monitor, external compliance officer or independent inspector.		(IGG-WYPD), is independent agency charged with investigating "NYPO practices and/or policies" pursuant to local law 70. Additional practices and/or post call law 70. Additional						
1 1				information about this independent inspector is publicly available at https://www.h.m.gov/inte/ploff/etcs/pendent/spector publicly available at https://www.h.m.gov/inte/ploff/etcs/pendent/specto						
1 1				undry), was ruin-fand vurci nedrulur reshribit her best						
11				Further, the "identification" as well as "the terms governing the						
				appointment, responsibilities, and authority" of any "monitor, external						
				compliance efficier, or independent inspector being appointed to review investigate, and/or operate NPD per and or investigate and or only in review investigate, and/or operate NPD per and or only in the contract of the						
				review, investigate and/or oversee NYPD practices and/or policies," unrelated to the subject matter of these litigations, and without a time						
				frame or the basis of the relevance of this request to these litigations, is						
11				not proportional. In addition, the burden of identifying each such "monitor, external compliance officer, or independent inspector" then "monitor, external compliance officer, or independent inspector" then						
118				spending hours/days to locate the requested documents, most of which						
11	DR No. 22	All documents concerning the October 17, 2011 letter to the Deputy Commissioner of Public Information ("DCPI") attached hereto as Exhibit A, including, but not limited to:	Responsive documents will be provided prior to the Court-ordered deadline							
1 1		records of the incidents referenced in that letter; records concerning any investigation								
11		or review of the incidents referenced in that letter; communications relating to that letter; responses or draft responses to the letter; communications, notes, attendance								
11		lists, or other records concerning any telephonic or in-person meetings concerning the								
1 1		incidents described in the letter and/or any policy change relating thereto; and documents concerning any policy or practice that was changed or for which changes								
1 1		were considered in response to that letter or the incidents described in the letter.								
119										
	DR No. 23	All documents concerning the November 21, 2011 letter to DCPI attached hereto as	Responsive documents will be provided prior to the Court-ordered							
1 1		Exhibit B, including, but not limited to: records of the incidents referenced in that letter; records concerning any investigation or review of the incidents referenced in that	deadline							
1 1		letter: communications relating to that letter: responses or draft responses to the								
11		letter; communications, notes, attendance lists, or other records concerning any telephonic or in-person meetings concerning the incidents described in the letter								
1 1		end/or any policy change relating thereto; and documents described in the letter and/or any policy change relating thereto; and documents concerning any policy or practice that was changed or for which changes were considered in response to that								
11		practice that was changed or for which changes were considered in response to that								
120		letter or the incidents described in the letter.								

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		T .		F G H I I J K L M N O P O R S T J U V J W J X J Y J Z J AA
A	DR No. 24	All documents concerning the November 21, 2011 letter to Mayor Michael R.	Responsive documents will be provided prior to the Court-ordered	c
		Bloomberg and Commissioner Raymond Kelly attached hereto as Exhibit C, including,	deadline	
		but not limited to: records of the incidents referenced in that letter; records concerning		
		any investigation or review of the incidents referenced in that letter; communications relating to that letter; responses or draft responses to the letter; communications.		
		notes, attendance lists, or other records concerning any telephonic or in-person		
		meetings concerning the incidents described in the letter and/or any policy change		
		relating thereto; and documents concerning any policy or practice that was changed or for which changes were considered in response to that letter or the incidents described		
		in the letter.		
121				
	DR No. 25	All documents concerning the August 6, 2012 letter to DCPI attached hereto as Exhibit	Responsive documents will be provided prior to the Court-ordered deadline	
		D, including, but not limited to: records of the incidents referenced in that letter; records	deadline	
		concerning any investigation or review of the incidents referenced in that letter;		
		communications		
		relating to that letter; responses or draft responses to the letter; communications, notes, attendance lists, or other records concerning any telephonic or in-person		
		meetings concerning the		
		incidents described in the letter and/or any policy change relating thereto; and		
		documents concerning any policy or practice that was changed or for which changes were considered in response to that letter or the incidents described in the letter.		
122				
	DR No. 26	All documents concerning the October 9, 2014 letter to Commissioner William Bratton attached hereto as Exhibit E, including, but not limited to: records of the incidents	Responsive documents will be provided prior to the Court-ordered	
		attached hereto as Exhibit E, including, but not limited to: records of the incidents referenced in that letter; records concerning any investigation or review of the	deadline	
		incidents referenced in that letter; records concerning any investigation or review or the		
		draft responses to the letter; communications, notes, attendance lists, or other records		
		concerning any telephonic or in-person meetings concerning the incidents described in the letter and/or any policy change relating thereto; and documents concerning any		
		policy or practice that was changed or for which changes were considered in response		
		to that letter or the incidents described in the letter.		
123	DO NI 27	All control of the state of the	Annual design of the second of	
1 1	DR No. 27	All correspondence with any of the signatories to the letters attached hereto as Exhibits A - E concerning interactions between the NYPD and members of the press, including	Responsive documents will be provided prior to the Court-ordered deadline	
1 1		but not limited to any complaints or reports of incidents made to DCPI or the DCPI	occount.	
124		office.		
1 1	DR No. 2829	All documents concerning the June 5, 2020 letter to Mayor Bill de Blasio, Commissioner Dermot F. Shea, and others attached hereto as Exhibit F, including, but not limited to	Responsive documents will be provided prior to the Court-ordered	
1.1		(and to the extent not encompassed by the above requests); records of the incident		
1.1		referenced in that letter; records concerning any investigation or review of the incident referenced in that letter; communications relating to that letter; responses or draft		
1.1		referenced in that letter; communications relating to that letter; responses or draft		
1.1		responses to the letter; communications, notes, attendance lists, or other records concerning any telephonic or in-person meetings concerning the incidents described in		
		concerning any telephonic or in-person meetings concerning the incidents described in the letter and/or any policy change relating thereto; and documents concerning any		
		policy or practice that was changed or for which changes were considered in response		
		to that letter or the incident described in the letter.		
125			1	
	DR No. 30	All documents concerning the September 8, 2014 remarks to the New York City Counsel Committee on Public Safety attached hereto as Exhibit G, including, but not limited to:	Unable to search for documents without any names or dates provided	The production of documents relating to the incidents in Exhibit G is
		records of the incidents referenced in those remarks; records concerning any	for the referenced incidents. Occupy Wall Street documents are being reviewed for production.	unduly outersome. Without the untimoration regarding no many of individuals or date and in the many of individuals or date and in the many of individuals or date in the many of individuals or
		investigation or review of the incidents referenced in those remarks; communications	,	or determing if relevant documents exist.
		relating to those remarks; responses or draft responses to those remarks;		
		communications, notes, attendance lists, or other records concerning any telephonic or in-person meetings concerning the incidents described in those remarks and/or any		
		policy change relating thereto; and documents concerning any policy or practice that		
126		was changed or for which changes were considered in response to those remarks or		
	DR No. 30	Documents concerning the incidents described in Appendix III to the Suppressing	Responsive documents will be provided prior to the Court-ordered deadline	
	Production contains	Protest Report, attached hereto as Exhibit H, including but not limited to documents created during any review or investigation of those incidents, as well as all training and	deadline	
	two requests labeled	documents concerning any policy or practice that was changed or for which changes		
	"Request for	were considered in response to those incidents.		
127	Production No. 30."			
	DR No. 31	All CCRB files relating to any complaint received by the CCRB related to the 2020 Black		Relevant documents can be located at: 3/11 and 3/18
		Lives Matter protests as cited in the CCRB's "CCRB 2020 PROTEST DATA SNAPSHOT – OCTOBER 18, 2021," attached hereto as Exhibit I, where such complaint concerns any		DEF 000344931, DEF 00034786- DEF 000352000
		interaction between an Officer and a member of the press or any person engaged in		DE_00035049
		photographing or video recording any Officer.		
128	-			
Samira Sierra, et. al. vs CNY, et al	DR No. 1	Produce all documents concerning the arrests described as "Mac Balla Member.	Defendants already produced documents responsive to this request at	
20 Civ 10291			D_105572-74 and D_105575-77.	
Third Set of Supplemental Discovery Requests				
130	DR No. 2	Produce all documents concerning the arrests described as "Three Individuals Arrested	Defendants already produced documents responsive to this request at	
1 1		After Bronx Car Stop and Found with Weapons; Interviewed by IB," at DEF_00157788.		
121				
131	DR No. 3	Produce all documents concerning "Social Media Posting Observed by IB Field	Defendants have not located additional documents regarding this social	
1 1		Operations Personnel," at DEF 00157779, including but not limited to any investigation	media posting.	
132	DR No. 4	into the subject matter of the "social media posting."		Order to the state of the state
1.1	UK NO. 4	Produce records sufficient to show all calls made and received, including the phone numbers and duration of calls, by all NYPD-issued phones between 5:00 p.m. and		Defendance object to this results pursues on the ground because the seek irrelevant. Usual be unably but usual but must be unably but usual but u
1.1		midnight on June 4, 2020, by every officer of the rank of lieutenant or above who was		bocate, identify and produce the requested information; and that the Inspectors, Deputy Chiefs, Assistant Chiefs, Bureau Chief of Department;
1.1		present at, or otherwise involved in policing, the Mott Haven protest and/or the MAPC		request is not proprional to the needs of the case. the duration of such calls: and the numbers called over a seven-hour time period. Such a
1.1		in Queens following the Mott Haven protest.		massive understaking would require hundreds of altorney and personnel hundred because, first, there is no compensative require a far analyzed prices and the compensative record of a record of a record of the compensative record of a record of the compensative record of the record o
1.1				the demonstration in Mott Haven: as plaintiffs may be aware, the detail rosters defendants
1.1				have previously producted only identify members of service of the ears of Lt Lt and below who were present at Medit Haven on Janue, 2000 for any portion of the demonstration. Thus, it
1.1				were present at Mott Naven on June 4, 2020 for any portion of the demonstration. Thus, it would take last produced that control the control to the control t
1 1				of all ranking filters on June 4, 2000 from every single precision, cut, that could
1 1				of all ranking officers on June 4, 2000 from every single preceivet, unit, task round possibly have been present in Not the term for any amount of the during five specified 7 hour for the preceived provided the provided of the preceived provided from the preceived from the
1 1				time period.
1 1				Second, countless more attorney and personnel hours would be wasted as defendants would
1 1				be required to speak to every single ranking officer present for any portion of the 7-hour time
1.1				frame and go through their phones for this irrelevant information - not to mention the surely
1 1				labor-intensive and time-consuming process, and general waste of resources, Would take to harness this date for mose shard are every retrimental pilone and produce it to
1.1				plaintiffs. Locating and producing this information to plaintiffs would be not only unduly
1.1				burdensome for defendants, but it is not proportional to the needs of the case, as the above-
1.1				describe burden and exponse of identifying and obtaining information regarding every single phone call made or received from every vaninis; officer with one over those or received from every vaninis; officer with over every law over the over the contraction of the over th
1.1				pinone call made or received from every vanking officer who was present at Mott Neven over the P-hour time period, outwelpins have been found that the present of the prese
1.1				
		The state of the s		
1 1				
133				

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A	DR No. 5	C Produce all video recordings depicting the June 4, 2020, Mott Haven protesters walking	D. Duranant to Dula 22(d) of the Enderel Dular of Civil Durant	E This request is duplicative of Plaintiffs' Consolidated Document	Į F		G	н		K L	M N	0 P	Q	R	S T	U V	w x	Y Z	AA
104	DN NO. 3	on the grounds of NYCHA public housing projects.	selections refer plaintiffs to the video focinge produced as part of derivatives from plaintiffs to the video focinge produced as part of derivativities followerse produced maker 18, 2021, to additional focinge produced in response to plaintiffs' First Consolidated Set of Requests for Documents, and to subsequent productions of video focinge. These productions have included: all TAMU focinge recorded quite fless that these protects on laws, 2022, all foolinger recorded by worth or body worn camera footings, including from the Mott Newmonth of the Control	Requests at No. 8(h) (see row 857 above). This request is also duplicative of Sires Phantiffs First Set of Supplemental Discovery Requests at Document Request No. 1.															
135 Samira Sierra, et. al.	DR No. 1	Produce the following Argus video footage concerning the June 4, 2020 Mott Haven,	As per agreement of the parties, all Argus footage sought by plaintiffs is	This request is duplicative of Plaintiffs' Consolidated Document	Samira Sierra, et. al.														+
v. CMY, et al., 20 Cu-10291 First Set of Supplemental Discovery Requests		Bronn, protest. All video despicting police preparations for the protest (e.g., placement of officers in the vicinity) patiented of Mobile Command Centers, placement of officers in the vicinity placement of Mobile Command Centers, placement of a protoper transport vehicles, deployment of Sefa and other police under the protest and subsequent arrests, including but not instead to a video depicting the vicinity of 1 54th Siveet and Third Avenue ("The Hub To from 6.00 p.m. to 7.30 pm. to course of the march from the vicinity of The Hub to East 135th Street and Book Avenue (from 6.30 pm. to 8.00 pm.	in the process of being collected and will be produced forthwith.	Requests No. 8(h) (see row #57, above).	v. CNY, et al., 20 Cu-v Jo29t First Set of Supplemental Discovery Requests														
	DR No. 2	Produce all documents and video footage concerning rioting, arson, looting, and any protests on Fordham Road in the Bronx on June 1, 2020.	Defendants have already produced responsive documents at DEF 0324110-DEF 0324184.	This request is duplicative of Plaintiffs' Consolidated Document Requests No. 8(h) (see row #57, above).															
137			Pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, defendants also refer plaintiffs to the documents disclosed in connection with defendant in similar blockouse on MARCH 18, 2021, and documents produced in response to Plaintiffs' First Consolidated Set of Requests for Documents.																
	DR No. 3	Produce all documents concerning any information known to the NYPD before or during the June 4, 2020 Mott Haven protest concerning illegal conduct, or the possibility thereof, at the Mott Haven protest.	Defendants have previously produced responsive documents, at DEF_0323967-DEF_0323972.	This request is duplicative of Plaintiffs' Consolidated Document Requests Nos. 8(a)-(b) (see row #57, above).															
139	DR No. 4	Produce all documents concerning any investigation before 800 p.m. on June 4, 2000, into any person who had made statements advocating illegal conduct at the June 4, 2020 Most Haven protest.	DEF_0323967-DEF_0323972.	This request is displicative of Document Request No. 3 of the Serra Readelf: Fast Set of Supplemental Discovery Requests, it now #254, supra. This request is further displicative of Plaintiffs' Consolidated Document Requests Nos. 8(4)-(b) (see row #57, above).															
140	DR No. 5		Defendants are coordinating with NYPO to continue searching for any documents that may be responsive to this request, and will produce any such documents to the extent they exist and are not shidded from disclosure by the law enforcement privilege (if the latter, defendants will produce a privilege log).	Requests Nos. 8(a)-(b) (see row #57, above).															
141	DR No. 6	Produce the document that someone from NYFD Legal showed Officer Herrandez- Carpio containing the marrative that he used to fill out the Postali's section of the arrest report for Charles Wood, as described in the July 12, 2021 deposition of Officer Hernandez-Carpio at pages 114-116.	142.																
142	DR No. 7	Produce all documents concerning the planning meeting at the 40th Precinct before the June 4, 2020 Most threw protest attended by executive staff, Chelf Monshan, Chief Wedin, and Assistant Chief Lehr as discussed in the document titled "Assistant Chief Lehr Digest," at DEF_000164215.	No such documents exist; the referenced "planning meeting" on June 4,020 took place on the hood of a car. No documents exist with respect to the meeting on the car hood.																
143	DR No. 8	If the Answer to the above Contention interrogatory is anything other than an unqualified "No", produce all documents concerning any communication to the marches that they should stop marching, should leave the roadway, were violating saw, were blocking whelcular or pedestir in teffic, or in any way communicated to the marches that they should desist from marching on the sidewalks and in the roadway.		Defendants object to Interrogatory No. 8, as it is a contention interrogatory and is therefore untimely under Local Civil Liub 33.3 of the Southern District of New York, which states that contention interrogatories must be served "at the conclusion of other discovery." LCR 33.3(c).															

A Samira Sierra, et. al.	DR No. 1	Produce all documents concerning the arrests resulting in the Desk Appearance Tickets	D Please see attached Schedule 1 for previously produced relevant	Ł		P	G	Н	3 K	L M N	U P P Q	R	S U	v W	A Y	Z AA
Samira Serra, et. al. v. C.W., et al. 20-Cu-10291 Des Seri of Supplemental Discovery Requests Des Seri of Supplemental Discovery Requests	DR No. 1	listed in the attached document produced by the Brown District Attorney in this latgistion, Batter unbened BDA000006. Exited "DES APPEARMER ("EXCEST (DAT) ISSUED DOR PROTEST-RELATED ARRESTS (June 2nd – June 5th)," including but not finished to: a. Dimidrom Arrest Reports, b. Omeldorm Compositin Reports, d. Dimidrom Arrest Reports, d. Protagraphs of each person arrested (including DAT processing photographs and any photographs to each person arrested (including DAT processing photographs and any photographs to each person arrested (including DAT processing photographs and photographs to each person arrested (including DAT processing photographs and any photographs to each person or including DAT processing photographs and protecting the processing photographs and photographs and processing photographs and photographs	documents													
45		n. Aided Reports, o. G.M.L. 50h hearing transcripts.														
44	DR No. 2	Produce all documents concerning the arrests resulting in the 312 Summonses listed in	Pease see attached Schedule 1 for previously produced relevant documents													
47	DR No. 3	Produce all documents concerning rioting, arson, looting, and any protests at or near	Please see attached Schedule 1 for previously produced relevant													
48	DO N. 3	Fordham Road in the Bronx on June 1, 2020, including but not limited to arrests Produce all documents concerning the arrests described as "Three Individuals	Duplicate of Rows 246-250 NOTE FROM BRIDGET: THESE ARE NOW	Dunliante of Dours 245 250												
49	DR No. 2		Duplicate of Rows 246-250 NOTE FROM BRIDGET: THESE ARE NOW DUPLICATES OF ROWS 235-239	Duplicate of Rows 246-250												
Sow, Adama et al., v. CNY 21cv533 Plaintiffs' First Set of Requests for Admission,	DR No. 1		All previously produced discovery. Any additional responsive documents if any exist will be provided prior to the Court-ordered													
Supplemental Interropatories and Requests for Production of Documents to ALL Defendants			Gate.													
	DR No. 2	Protest: L any and all communications, sactical decisions, intelligence alerts, policies or other directives issued by any Officer as a result of such intelligence reports, assessments, or their information pertaining to the Proteins; L news dops, social media postings, and internet links gathered by the NPPD, including but not limited to such information and record gathered or created by the Office of the Departy Commissioner for Public Information (PCDPT), the Intelligence Division, or otherwise, related any Protest; L requests for detail, Operations (making pleath Section) process, "Oslo", "Most subject to the Communication (PCDPT), the Intelligence Division, or otherwise, related to any Protest; L requests for detail, Operations (making pleath Section) process," Oslo", "Most subject to the Communication," (making pleath Section) process," Oslo", "Most subject to the Communication," and other record created as a result of or related to the Operation any incident Communication with policing a Protest; I records reflecting whether and, if so, by whome, when, and to what extent, dispersal orders or other warnings and opportunities to disperse or comply were given before enforcement action was based and the related or section where there is the operation of the warnings and opportunities to disperse or comply were given before enforcement action was blank at each forest where force was used or detentions or used or detentions or used or detentions or development and one of a detention or the conformation action was thank as the Protests where force was used or detentions or used or detentions or determined and one of the control or the conformation action was thank as the Protests where the other operations are control or other warnings and opportunities to disperse or comply were given before enforcement action was thank as the Protests.	Disclosure VOL002_Confidential VOL003_Confidential VOL003_Confiden	Responsive documents may be subject to the attorney-client are attorney work product privilege. Fivillege log to be provided if documents contain privilege.	nd/or											
52	DR No. 3	Produce all SRG documents for the protests dates and locations identified in Schedule	Responsive documents previously provided in 20210804_Initial-													
i a		a. City Mobilization Log: b. Intelligence packs distributed by Local SRG Commanding Officer to supervisors that would appear at detail; would appear at detail; detail of the state of the	Disclosure VOLIOD2 Confidential VOLIOD3 Confidential VOLIOD3 Confidential VOLIOD3 Event Confidential VOLIOD3 Event Confidential VOLIOD4 Confidential VOLIOD4 Confidential VOLIOD5													

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^	DR No. 4	Produce all OLPA (zOLPA) for all putative class members arrested from May 28, 2020 to		į.	<u>'</u>		G		н		, K		et N	J P	Ų			. v	W X	1 2	AA
154			Docksure VOLIDGE, Not Confidential VOLIDGE,																		
	DR No. 5	Produce redacted OLPA (2OLPA) for individuals arrested from May 28 to June 6, 2020, not at locations listed in Schedule A.		The production of OLPA from May 28 to June 6, 2020 of arrests not or schedule A is irrrevant, overbroad and unduly burdensome, and not	n The buren of producing all documents regarding	ng all people arrested in New York City during	a 10 day period when many	of those arrests likley h	ave nothing to do wit	h protestors and th	en attempting to	determine which	are sealed and theref	ore cannot be proc	duced is not p	roportional to th	ne needs of the case	, as it would take a	t least 200 hours of pe	rsonnel time to comp	ete this task.
155	DR No. 6	Produce any and all documents concerning the City's response to the COVID-19	20210804_Initial-Disclosure	proprisonal to the needs of the case																	
157	DR No. 8	Produce any and all documents including electronic communications related to the preparation of mass arest processing facilities saintation logs, pest control logs, plans for cleaning, tollocit cleaning provisions and logs, provision of cleaning equipment and products for the same, heating and cooling of the facilities and transport vehicles where prisoners would be held during processing time.	prior to the Court-ordered date.																		
159	DR No. 9		Disclosure VOL005_Not Confidential VOL006_Not Confidential VOL006_Not Confidential VOL007_Confidential VOL007_Not Confidential VOL007_Not Confidential	There are no documents for verbal decisions to arrest protesters.																	
.160	DR No. 10	briefings and training given to the individuals city employees who were in charge of supervising mass arrest processing facilities.	VOLODS, Not Confidential VOLODS, Not Confidential VOLOD7_Confidential VOLOD7_Not Confidential VOLOD8_Confidential VOLOD8_Confidential																		
.161	DR No. 11		VOL005_Confidential	Responsive documents may be subject to the attorney-client and/or attorney work product privileges. Privilege log to be provided if documents contain privilege.																	
162	DR No. 12	Produce any and all documents, including electronic communications related to the information collected pursuant to Loal use 8-2020, the Department's Early Intervention Program (which collects information regarding certain declinations to prosecute), as well as Law Department declinations to indemity or represent offices in civil lawsuits brought from protest arrests alleging a constitutional violation.		Responsive documents, if any, may be subject to the attorney-client and/or attorney work product privileges. Privilege log to be provided in documents contain privilege	if																

A	DR No. 13	C Produce any and all documents reflecting policy changes, changes in training, or finest	No reconneive documents exist	E	F	G	н	К	L M	N O	Р	Q R	S T	U V	W	х ү	Z AA
	DK NO. 25	motispic, and/or any discipline that incurred by any officer which were in some way a reagonets the liquidgment in Added v. (10 New York, No. 50, K-65 PBIS) (S. N.Y.), and/or Gerbacher v. Winski, No. 14 Co. 7500 S.D.N.Y.), settlement in Rodriguez v. Winski, 12 Co. 389 RBIS (S. N.Y.) and direct court summary sudgened decision in Dinler v. City of New York 1:04 co-7921 (S.D.N.Y.) (Dist. No. 312 therein).															
163																	
	DR No. 14	Produce any and all documents reflecting policy changes, changes in training, or finest messages which were in some way a response to the settlement of the RNC cases,	No responsive documents exist.														
		including but not limited to MacNamara, et al., v. City of New York, et al., 04 Civ. 9216 (6MG)(ICF) (S. D.N.Y.).															
164	DR No. 15	Produce the Joint Operations Center (JOC) logs for each day listed in Schedule A.	Any responsive documents to the extent that any exist will be provided														
165	DR No. 16	Produce the Mass Arrest Processing Center (MAPC) logs for each day listed in Schedule A	prior to the Court-ordered date.														
144			Disclosure VOLODZ Confidential VOLODZ Confidential VOLODZ Confidential VOLODZ Describential VOLODZ Describential VOLODZ Describential VOLODZ Describential VOLODZ Confidential VOLODZ VOLODZ Confidential VOLODZ VOLODZ Confidential VOLODZ VOL														
	DR No. 17		Responsive documents previously provided in VOL035_Confidential														
	DR No. 18	Produce the intelligence bureau surveys for each day listed in Schedule A.	Any responsive documents to the extent that any exist will be provided														
100	DR No. 19	Produce the spreadsheet titled "Protest Related Activity May 28 through June 7" and	prior to the Court-ordered date. Documents produced														
170	DR No. 20	referenced at pg. 24 of the NYC Dept. of Investigation Report. Produce any press releases, press advisories or the like issued by members of Deputy Commissioner of Public Information ("DCPI")'s office from May 28, 2020 to July 1, 2020.	Defendants produced documents responsive to this request on March 11, 2022.														
171	DR No. 21	Produce the communications from Chief Terence Monahan which ordered the release of the legal observers. See NYC Department of Investigation Report, Pg. 44.															
122	DR No. 22		Responsive documents previously provided in VOL002_Confidential VOL005_Confidential VOL005_Confidential VOL005_Confidential VOL005_Confidential VOL005_Responsive for Confidential VOL007_Confidential VOL007_Confidential VOL007_Confidential VOL006_Confidential VOL006_Confidential VOL006_Confidential VOL006_Confidential VOL007_Lendering for Confidential VOL007_Lendering for Confid														

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+	A	DR No. 23	C Produce records which reflect the efforts of the NYPD, or any City agency, to	D Responsive documents previously provided in VOL002 Confidential	E	F	G	н	J K	L M	N	O P Q R	S	T U	V	w x	Y Z	AA
		DR 140. 25	investigate the prevalence of NYPD employees covering their badges.	NCULOS Confidential VOLIOS To Confidential VOLIOS Not Confidential VOLIOS No														
				VOL009_Not Confidential VOL009_Confidential VOL009_Confidential VOL001_Not Confidential VOL001_Confidential VOL001_Confidential VOL001_Confidential														
				VOL019_Not Confidential VOL032_Confidential VOL032_Confidential VOL032_Confidential VOL035_Confidential VOL035_Confidential VOL037_Confidential														
173		DR No. 24	Produce records which reflect the efforts of the NYPD to decrease the prevalence of	VOL039_Confidential Responsive documents previously provided in VOL002_Confidential														
				VOLIDS, Confidential VOLIDS, Not Confidential VOLIDS, Not Confidential VOLIDS, Not Confidential VOLIDS, Not Confidential VOLIDS, VOLIDS, Confidential VOLIDS, VOLIDS, Confidential														
				VOLDB2, Confidential														
174		DR No. 25	Produce records which would reflect Commissioner Shea's concern that the curfew	Email discovery previously produced.														_
175		DR No. 26	would suppress first amendment activity. Produce records of the statements made by the Mayor stating that the City will not														_	
176		DR No. 27	enforce the curfew against "peaceful protesters." Produce documents which show the basis for the statement made on May 31st by	Email discovery previously produced														
177			Deputy Commissioner John Miller at a press briefing where he stated that NYO had evidence providing a high level of condinence that disorderly groups had organized scouts, medics, and supply routes of rocks, bottles, and accelerants for the purpose of vandalism and violence.	e														
179		DR No. 28	Produce documents which show the basis for the statement made on June 5 by Mayor de Blasis and Commissioner Shae pointed to intelligence to justify the mass arrest that took place the prior evening in Mott Haven.	Email discovery previously produced														
		DR No. 29	Produce documents which show the basis for the statement made on June 6, Deputy Commissioner Miller provided second press brilling where he provided data on arrest, burgarier, and the numbers of injured officers. Deputy Commissioner Miller also noted that defines had been stated on white his can be any whiches, and other data officers had been stated on the brilling state of the	,														
180		DR No. 30	Produce the whole daily binders from the intelligence division for the days listed in Schedule A.		Defendants object as this request is overbroad, irrelvant, overly burdensome and not proportional to the needs of the case	The "whole daily binders" contain irrlevant information, much of it law enforcemnt sensitive, that has nothing to do with the protests at issue. The 50+ hours needed to collect, review, redact and provide a privilege log is not proportional to the needs of the case, as intellegence information specific to the protests has been provided												
181		DR No. 31		prior to the Court-ordered date.	These documents may be subject to the law enforcement privilege. Privilege log to be provided if documents contain privilege.													
182		DR No. 32	Produce the Tactical Assessments prepared by the intelligence division for the days listed in Schedule A.	prior to the Court-ordered date.														
102		DR No. 33	Produce the Handschu Investigative Statements prepared by the intelligence division for the days listed in Schedule A.	Responsive documents previously produced in VOL002_Confidential VOL005_Confidential VOL005_Not Confidential VOL006_Not Confidential VOL007_Confidential														
		DR No. 34	Produce the Assdemy curriculum including the four-hour module on disorder control training conducted by the Disorder Control Unit.	Responsive documents previously produced in VOL002_Confidential VOL005_Confidential VOL005_Confidential VOL005_Confidential VOL006_Not Confidential VOL006_Not Confidential VOL006_Not Confidential VOL007_Confidential VOL007_Not Confidential VOL007_Not Confidential VOL008_Not Confidential VOL008_Not Confidential VOL008_Not Confidential VOL008_Not Confidential VOL008_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL008_NOT														
184				VOLIS Confidential VOLIS Confidential VOLIS Confidential VOLIS NOI Confidential VOLIS NOI Confidential VOLIS Confidential														

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186 187 Minetty NYC et al. 21cy8161	DR No. 36		VOL002_Confidential VOL007_Not Confidential VOL008_Confidential	OL001 VOL009_Confidential			Initial Disclosures Minett													